



National  
**Watermelon**  
Promotion Board

327

August 24, 2004

USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive  
Room 1034  
Alexandria, VA 22302

AUG 30 2004  
Arney

Arney  
10/1

Dear Sir or Madam:

My name is Mark Arney and I am Executive Director for the National Watermelon Promotion Board (NWPB). The NWPB works to increase consumer demand for watermelon and expand domestic and foreign markets for watermelon through a variety of promotion, research and education programs.

Our association belongs to the Produce for Better Health (PBH) Foundation. We strongly concur with PBH's recommendation that the new Food Guidance System needs to place a much stronger emphasis on the role of fruits and vegetables.

We urge USDA to place fruits and vegetables at the bottom of the pyramid. The Dietary Guidelines Advisory Committee's proposed recommendations that Americans should eat 5 to 13 servings of fruits and vegetables a day. We agree with the advisory committee's recommendations.

Sincerely,

Mark Arney  
Executive Director

Phone: [redacted]  
Fax: [redacted]

Orlando, FL [redacted]

Winter Park, FL [redacted]

[www.watermelon.org](http://www.watermelon.org)

postmarked Aug 24, 04



Frederick Ravid

Atlanta, GA

USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

8/24/2004

*Immune*

328

*Ravid*

*1 of 2*

*act*  
AUG 30 2004

I am in favor of adoption of the modification of the food pyramid as stated below. I am also disturbed that FDA is not accepting emails, thus making it harder for citizens to communicate about this crucial matter of health.

The Following Pyramid Is Proposed

The base should be the maintenance of energy, having an exercise program and controlling calories and weight.

The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.

The next level should be whole grains and starchy vegetables.

The next level should be legumes, beans, peas, sprouted nuts and seeds.

The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats.

A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt ( no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.

What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients,

*postmarked 8/25/04*

vitamins and minerals which can keep the body healthy.

If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the WHO's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet.

A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Ravid  
2 of 2

ALBERT F. GORDON

329

TEL/FAX:

• Stephentown, NY  
• E-mail

8/26/04

Gordon/1041

Aug 30 2004  
af

Please, USDA, emphasize BEANS + NUTS  
+ other plant based sources of protein rather  
than MEAT.

As for milk, we are still the only species  
that drinks the milk of another — + for babies?  
Can't you change the "milk" category to  
CALCIUM GROUP?

Thank you  
J. Gordon

postmarked 8/26/04

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ALLISON MARIE MEMMO GEIGER

DRESHER, PA  
PHONE:

EMAIL:

August 26, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Geiger  
10/1

AUG 30 2004  
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Re: Changes to the Pyramid

Dear Team,

There are several changes I would like to see implemented into the current Food Guide Pyramid. First, I would like to see the "milk" group changed to the "calcium" group, and it should include leafy greens and blackstrap molasses. Next, I would like the "meat" group changed to the "protein" group, and this should emphasize plant-based proteins such as beans and nuts, which don't carry the health risks associated with the animal products. Finally, I would like to see the recommendations for fruits to increase to four servings a day and vegetables, five.

Very truly yours,

  
Allison Marie Memmo Geiger

postmarked 8/26/04

Melissa Jensen, 1503 Pacific St. Apt. #2, Bakersfield, CA 93305

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

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AUG 30 2004  
asf

Thursday, August 26, 2004

Jensen 10/1

To Whom It May Concern:

I would like to offer my opinion on the changes to be made to the food Guide Pyramid. I have two school age children and would like them to be well informed on nutrition.

I feel strongly that to fulfill the intended duty the "Dairy" section be changed to the "Calcium" section. There are many calcium rich foods that have less fat than even low fat milk such as green leafy vegetables and garbanzo beans.

I am not suggesting that dairy be removed from the food guide, only that it should not be promoted as having a monopoly on calcium when there are so many with lactose intolerance or who do not consume animal products. We should be educating everyone in proper nutrition and this will be a step in the right direction.

Please use your power to make a change for a less biased, more accurate Food Guide Pyramid. Thank you for the opportunity to input.

Sincerely,

Melissa Jensen

posted 8/26/04



# Iowa Department of Public Health

Thomas J. Vilsack  
Governor

Sally J. Pederson  
Lt. Governor

Mary Mincer Hansen, R.N., Ph.D.  
Director

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August 26, 2004

Solberg  
1 of 3

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Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria VA 22302

To Whom It May Concern:

RE: Notice of Proposal for Food Guide Graphic presentation and Consumer Education Materials; Opportunity for Public Comment

Dietitians from the Bureau of Nutrition and Health Promotion submit the following responses to the Federal Register notice, vol. 69, No. 133 that was issued on Tuesday, July 13, 2004.

A. Motivational/Awareness Components  
Graphic

- While there was not complete agreement on keeping the pyramid graphic, the majority felt there were more pros than cons to keeping the basic shape of the graphic.
- The graphic symbol should reflect the proposed food patterns. For example, using forms of each food in a group with the lowest fat content and without added sugars: distribution of vegetables among dark-green, deep-yellow, legumes, starchy; emphasis on whole grains; and pictured in the recommended serving sizes, if possible.
- We agree that the graphic should not be used as a stand-alone educational tool. While we appreciate the concern about the complexity of the food messages to be conveyed, it would be helpful to have the graphic convey basic nutrition messages so that it can be used as an education tool - not just a symbol. For example, removing the number of servings from the existing pyramid would still allow for the message of proportionality and variety to come through.
- To decrease the "one-graphic-fits-all" problem, consider designing one for children, adults, and older adults (similar to Tufts).
- We are not opposed to having physical activity incorporated into the graphic, but physical activity should have a stand-alone graphic reflecting the variety of physical activities.

Postmarked 8/26/04

Promoting and protecting the health of Iowans

Des Moines, IA

• [www.idph.state.ia.us](http://www.idph.state.ia.us)

DEAF RELAY (Hearing or Speech Impaired)

Slogan

- We are very supportive of a companion slogan. Many people remember slogans from education programs such as "4-4-3-2, that's the formula for me and you" that was used with the Mulligan Stew nutrition education program. Physical activity should be a part of the slogan.

A. Core Messages and Framework

We do not have any disagreement with the three key behavioral outcomes.

- The core messages that will be developed should not be vague using phrases like "moderate your intake." If we are going to tackle the obesity crisis there must be "eat less" messages of the food items that are not nutrient dense and will almost assure that an individual cannot meet the food patterns unless they are extremely active.
- Develop a positive message that an individual's diet can be more liberal if they increase physical activity.
- Promoting individual foods that are nutrient dense is logical but the Food Guidance System should also reflect how people really eat: convenience meals, soups, mixed dishes, etc. How would individuals know to fit these in the food patterns?
- Language must be very simple and actionable. Testing of the messages is critical! Do not invest money into developing print materials if the messages have not been thoroughly tested. Test with as many audiences as possible: Children, teens, and older adults (over the age of 70) need to be included if the Food Guidance System is intended for all ages.
- The wording of core messages (and perhaps the content) may need to be adjusted for a particular audience. For example, how would the requirement for vitamin D be conveyed to an older adult, as this would likely need to be taken as a supplement?

B. Interactive personalized guidance

Level 1

- The Internet would be a logical venue for the interactive tools. However, it might be possible to explore a hand-held tool for the basic information. For example, multi-layered wheels could allow an individual to select their personal characteristics and once those were in place, a proposed pattern would show up in a special box or wedge.
- On the Internet, could the individualized food pattern be depicted using real food in appropriate serving sizes?

Level 2

- Interactive tools should include popular convenience and ethnic foods reflecting the way teenagers and young families eat.
- Include advice about how to comply with a food pattern if the individual chose a "fast food" meal. Recommend substitutions for over-consumed foods that are not providing a healthy calorie: nutrient balance.



(Solberg) 2 or 3

- Provide examples on how to use food labels to avoid trans fats and to select nutrient-dense or lower sodium foods.
- Many individuals would welcome sample menus.
- Simple instructions on how to limit discretionary sugars and fats will be essential.
- Provide guidance on types of fats.
- We support the development of print materials for different audiences. Again, please make sure to include older adults. If the main graphic were to be modified to reflect the needs of children, adults, and older adults, then the print materials should correspond with the same target audiences.

Sincerely,

*Judy Solberg*

Judy Solberg, MPH, RD, Chief  
Bureau of Nutrition and Health Promotion

*Brenda Dobson*

Brenda Dobson, MS, RD  
Nutrition Services Coordinator

*Carol Voss*

Carol Voss, MEd, RD  
Community Health Consultant

*Emily Roepsch*

Emily Roepsch, MPA, RD, LD  
Community Health Consultant

*Susan Pohl*

Susan Pohl, MS, RD  
Community Health Consultant

*Angie Tagtow*

Angie Tagtow, MS, RD  
Community Health Consultant

*Carlene Russell*

Carlene Russell, MS, RD  
Community Health Consultant

*Doris Montgomery*

Doris Montgomery, MS, RD  
Community Health Consultant

*Holly Szcudronski*

Holly Szcudronski, RD, CLC  
Breastfeeding Coordinator

*Jan Steffen*

Jan Steffen, MS, RD  
Community Health Consultant

August 23, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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AUG 30 2004  
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RE: Comments on Food Guide Pyramid

(Pike) 1 of 1

As you are reassessing the food guide pyramid, I would like to see more information on how I can incorporate more vegetables and vegetable products (like soy, tofu, etc.) into my diet. Like most Americans, I am trying to manage my health through better nutrition and food choices. One thing that I notice is lacking in many of the USDA publications and specifically the Food Guide pyramid, is how to incorporate sources of vegetable protein into my diet.

I am not a vegetarian, and I do consume a wide range of animal foods, but please consider more information about the topics of vegetable-based proteins like soy, TVP, and other similar products. These are becoming easily available in the supermarkets, and I think the USDA should take the lead in providing unbiased information about these products, similar to how it currently provides information about dairy products and beef.

Thank you for your consideration.

  
Richard Pike

Cobb Island, MD

postmarked 8/27/04

8/24/2004

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AUG 30 2004  
ask

To: Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Peterson 1 of 2

To Whom It May Concern:

This was written by Jackie Graff but I am sending it as I feel that she is 100% right on target here in regards to the new proposals for a new Food Guide Pyramid.

By Jackie Graff, R.N., B.S.N.

The present food pyramid along with high powered advertising are part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged. I see this in my work as a nurse.

The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines.

The TRUTH is needed- some will follow and some will not. We cannot change everyone. Some will eat what they want with no consideration of their health. People that want to improve are confused and need guidance, they need the truth. There are many diet books out there that do not work long term, this is why there are so many- because they do not work. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation.

This change in the food pyramid should not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that do not come in packages. These contain a large amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease.

The nutrients we need to get from our food cannot successfully be

postmarked 8/26/04

Peterson 2 of 2

obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

The Following Pyramid Is Proposed

The base should be the maintenance of energy, having an exercise program and controlling calories and weight.

The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.

The next level should be whole grains and starchy vegetables.

The next level should be legumes, beans, peas, sprouted nuts and seeds.

The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats.

6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt (no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.

7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.

8. If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the WHO's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet.

9. A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Respectfully, Breezi Peterson

*Breezi Peterson*

Lakebay, Wa.

*Yoshida*  
*1 of 3*

July 2, 2004

✓ Kelvin Yoshida

✓ Pearl City Hawaii

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Congressman Neal Abercrombie  
US House of Representatives  
Prince Kuhio Federal Building  
300 Ala Moana Blvd.  
Room 4-104  
Honolulu, HI 96850

Dear Congressman Neal Abercrombie,

My name is Kelvin Yoshida. I live in Pearl City, Hawaii and am Boy Scout from Troop 49 in Honolulu. I am writing to you regarding my views about obesity as a national issue.

In the United States, obesity has risen at an epidemic rate. The United States spends billions on health care. Yet, the rates for obesity are escalating. The impact caused by type 2 diabetes, heart disease, arthritis, stroke and the other conditions caused by obesity are only going to escalate.

Obesity in children and adolescents is a serious issue with many health and social consequences that often continue into adulthood. Implementing prevention programs and getting a better understanding of treatment for youngsters is important to controlling the obesity epidemic. The United States Department of Agriculture (USDA) should change the Food Pyramid.

The current food pyramid, small tip at the top shows fats, oils, and sweets. These are foods such as salad dressings and oils, cream, butter, margarine, sugars, soft drinks, candies, and sweet desserts. These foods provide calories and little else

nutritionally. Most people should use them sparingly. On the second level of the Food Guide Pyramid are two groups of foods that come mostly from animals: milk, yogurt, cheese; and meat, poultry, fish, dry beans, eggs, and nuts. These foods are for protein, calcium, iron, and zinc. The next lower level includes foods that come from plants - vegetables and fruits. Most people need to eat more of these foods for the vitamins, minerals, and fiber they supply. At the base of the Food Guide

**The Food Guide Pyramid**

A Guide to Daily Food Choices

Fats, Oils, & Sweets  
USE SPARINGLY

Milk, Yogurt,  
& Cheese  
Group  
2-3 SERVINGS

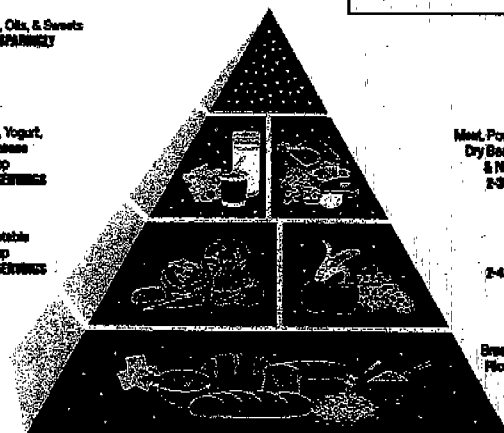
Vegetable  
Group  
2-4 SERVINGS

Meat, Poultry, Fish,  
Dry Beans, Eggs,  
& Nuts Group  
2-3 SERVINGS

Fruit  
Group  
2-4 SERVINGS

Bread, Cereal,  
Rice, & Pasta  
Group  
6-11 SERVINGS

**KEY**  
[ ] Fat (saturated, monounsaturated, and polyunsaturated)  
[ ] Sugars (added)  
These symbols show fat and added sugars in foods.



Yoshida 2 of 3

Pyramid are breads, cereals, rice, and pasta - all foods from grains. You need the servings of these foods each day.

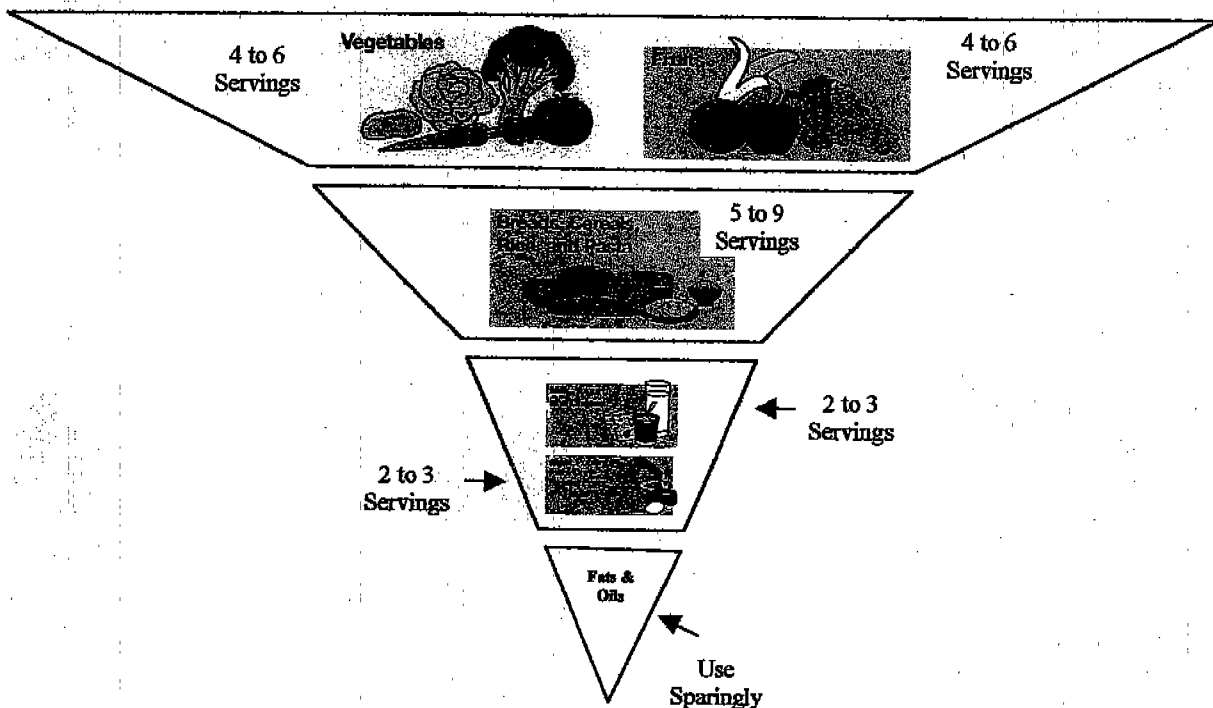
The USDA should be advised to change the Food Pyramid. They should switch the bread and plant group spots in the current Food Pyramid. Place the foods that come from plants at the base instead of the bread cereal, rice and pasta foods because most people need to eat more of these foods for the vitamins, minerals, and fiber the plants supply. There could be one other change, which would be to turn the Food Pyramid upside down. This way the top would be large with the foods that we should eat more of at the top and the foods we should eat less of at the bottom (see diagram below).

What do you think about my suggestion on changing the food pyramid? I look forward to your thoughts on obesity.

Thank you for your time.

*Kelvin Yoshida*

Kelvin Yoshida



**NEIL ABERCROMBIE**

1ST DISTRICT, HAWAII

WHIP-AT-LARGE



*Yoshida 3/13/3*

COMMITTEE ON  
ARMED SERVICES

COMMITTEE ON  
RESOURCES

**Congress of the United States  
House of Representatives  
Washington, D.C.**

August 25, 2004

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Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

To Whom It May Concern:

At the request of my constituent, Kelvin Yoshida, I am forwarding his suggestions for changes to the Food Guide Pyramid.

Please don't hesitate to contact me if you should have any questions. Thank you for your time.

Sincerely,

Neil Abercrombie  
Member of Congress

ORIGINATED FROM:

☒ WASHINGTON OFFICE:

☐ HOME OFFICE:

Homepage: <http://www.house.gov/abercrombie/>

WASHINGTON, D.C.

HONOLULU, HAWAII

August 26, 2004

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Stephenson

1 of 1

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The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

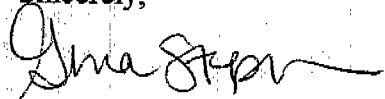
RE: Redefinition of the Food Pyramid

I am truly encouraged and excited that you are taking a look at the Food Pyramid and considering updating it to reflect recent findings on how what we eat affects our health. PLEASE emphasize healthier plant-based sources of protein such as beans and nuts in their "meat" group. It has been well documented that disease does not occur in a ph basic cell, and that meats cause the body to produce acid that leaves our cells in a more vulnerable "acid state", thus more susceptible to all diseases. Fruits, vegetables, nuts and whole grains create a basic cell environment, leading to better overall health.

Also, I would like to see you change the "Milk" group to the "Calcium" Group to more accurately describe what our bodies need, not target a specific product. Green leafy vegetables are the very best source of calcium available! Milk is under great scrutiny for being associated with prostate cancer in men and Crohn's disease. Recently live paratuberculosis bacteria was found in retail milk purchased from stores in Wisconsin, California and Minnesota, proving that the organism can survive pasteurization![1]

Please do the right thing! Help parents by emphasizing a diet of mostly vegetables, nuts, whole grains and fruits, with limited exposure to products tainted by hormones, antibiotics, bacteria and pesticides.

Sincerely,



Gina Stephenson

[1] Cheese Reporter 19 August 2004

pos marked 8/26/04



Theresa Sharp

Irvine, CA

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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Sharp

1 of 2

AUG 30 2004  
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Dear Sirs/Madams:

The present food pyramid along with high powered advertising are part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged. I see this in my work as a nutritional microscopist.

The American public need to be educated about the truth of the risks associated with the Standard American Diet (SAD). Though some will follow and some will not, people that want to improve are confused and need guidance, they need the truth. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation.

We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines. Harvard Medical has already made proposed changes based on all current research, which you can check online at their site.

This change in the food pyramid must not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that are not processed (or at least minimally so). These contain a large amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease.

The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

#### The Following Pyramid Is Proposed

The base should be an exercise program and adequate hydration with non-sugary, non-caffeinated fluids.

The next level should be a variety of organic, whole, complex carbohydrates, such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.

The next level should be legumes, beans, peas, sprouted nuts and seeds. Followed by whole grains and starchy vegetables.

postmarked 8/25/04

Sharp 2 of 2

The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats.

6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt ( no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.

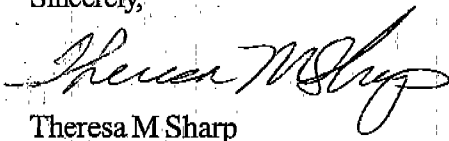
7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.

8. If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the WHO's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet.

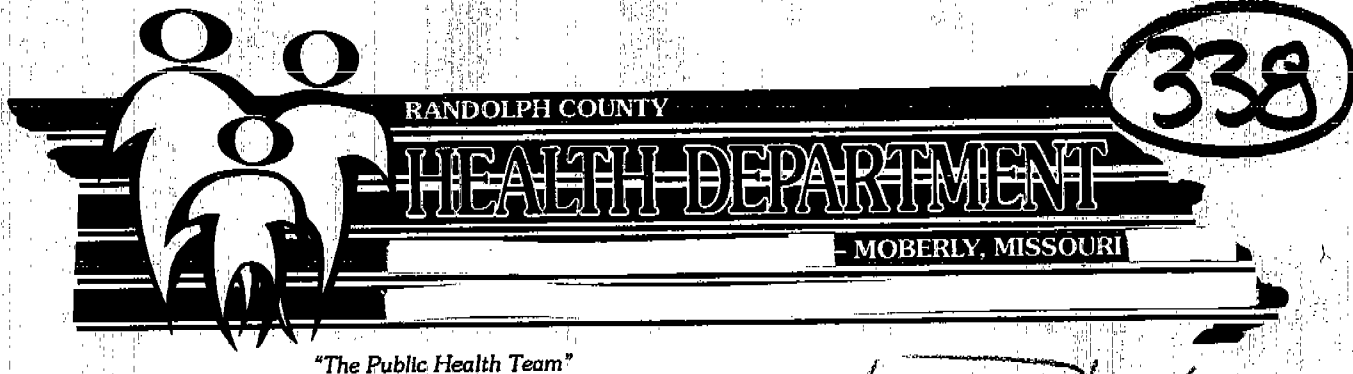
9. A plant-based, vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Thank you for your attention to my letter and God bless your progress!

Sincerely,



Theresa M Sharp



*Sydow 10/1*

*AUG 30 2004*  
*ask*

Good Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

To Whom It May Concern:

As health educators for Randolph County Health Department, we are contacting you in support of the following revisions:

- Increase the suggested number of fruits and vegetables to 5 to 13 servings a day
- Assure that fruits and vegetables figure prominently in the revised graphic of the Food Guide Pyramid base to reflect the increased servings suggested.

Thank you for your consideration.

Sincerely,

*Martha Sydow*

Martha Sydow, RN, BSN  
HCNEI Program Coordinator

*Mary Strada*

Mary Strada, RN  
HCNEI Event Coordinator

*postmarked 8/25/04*

**\*\*AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER\*\***

All services provided on a non-discriminatory basis without regard to race, color, religion, national origin, sex, handicap or age.

IOWA STATE UNIVERSITY  
OF SCIENCE AND TECHNOLOGY

8/24/04

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Department of Food Science  
and Human Nutrition

Ames, Iowa

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Cetner Drive, Room 1034  
Alexandria, VA 22302

Litchfield 1 of 3

AUG 30 2004  
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Dear Committee:

I would like to make the following comments regarding revisions to the Food Guide Pyramid on behalf of Iowa State University Extension.

*Advantages and disadvantages of retaining current shape for graphic and other potential shapes to use as a representative of the overall Food Guidance System.*

Maintaining the current graphic is critical to prevent consumer confusion and build on the fact that 80% of Americans recognize the Food Guide Pyramid. The pyramid graphic correctly depicts the recommended diet composition for healthy, adult Americans. The Food Guidance System was not designed to prevent nor treat specific diseases and cannot do so without becoming overly complex and cumbersome. In doing so, a large segment of the population would become confused and ignore the Food Guidance System entirely.

While graphic recognition is high at 80%, understanding and use of the current Food Guide Pyramid is limited. The single most important lack of understanding is that of appropriate portions or serving sizes. The current Food Guide Pyramid does not address portion sizes adequately. The graphic refers to number of servings; however, the consumer is required to search for additional information to determine what is considered a serving. In addition, the Food Guide Pyramid does not graphically represent individual servings – whole foods such as a loaf of bread, bunch of grapes, and whole turkey DO NOT depict appropriate servings. Why not graphically depict single serving sizes within the graphic and the appropriate number of servings recommended? For example, in the bread, cereal, rice and pasta group graphically depict 6-11 individual servings of bread, cereal, rice or pasta.

In light of the overweight/obesity epidemic it would seem prudent to not include high fat, high calorie (i.e. cake, pie, cookies, donuts) in the graphic of the Food Guide Pyramid. These foods should be moved from the bread, cereal, rice and pasta group to the fats, oils and sweets. Greater emphasis on whole grains needs to be clearly indicated by the graphics for this food group as well as the list of foods included in the group and any supporting materials

The graphic needs to place more emphasis on the lower caloric levels – most consumers do not achieve moderate activity levels, thus higher caloric levels. Highlighting food groups with higher sodium and fiber content would also be useful. It might be useful to change the background color of the graphic to highlight that a change as occurred.

postmarked 8/25/04

Litchfield 2003

*Usefulness of the proposed strategies to highlight both motivational/awareness and educational messages.*

A graphic symbol with a slogan would be helpful to achieve brand name recognition for the Food Guidance System. Careful analysis of successful marketing campaigns used by industry and business entities could help identify key marketing strategies. Similar strategies and tactics should be employed for nutrition and health messages. The graphic should continue to depict easily identified general food guidance, do not separate the graphic from the educational message.

*Advantages and disadvantages of the plan to individualize guidance in contrast to generalized messages.*

Providing individualized recommendations is problematic. This would require the development of lengthy, complex materials, which can be difficult if not impossible for consumers to discern. Individualized recommendations are not appropriate, and not the intent of the Food Guidance System. For individual concerns, consumers should be seeking out a qualified health professional.

*Advantages and disadvantages of the planned focus on core messages in contrast to use of a graphic to represent educational messages.*

The Food Guidance System should provide the guidance on recommended diet composition within graphic representation. The ability to convey a concept in an easy-to-interpret and easy-to-understand graphic is important to a successful educational message. The additional issues and messages that have been proposed for incorporation into the Food Guidance System tend to apply to specific, discrete audiences, and not the general public. These are the messages should be addressed in supporting materials and individually by a qualified health professional. A learning opportunity and teachable moment is lost by not tying a basic nutrition message with the Food Guidance System graphic. The basic nutrition message depicted in the Food Guidance System should complement the Dietary Guidelines. For example, with the current Dietary Guidelines the messages would be: 1. Aim for Fitness, 2. Build a Healthy Base, and 3. Choose Sensibly.

*Key components for effective interactive educational tools.*

Key to any successful learning is the engagement/interaction of the learner with the material. The Interactive Healthy Eating Index and the Interactive Physical Activity Tool are appropriate for basic nutrition and physical activity messages. Although the messages may be more specific with respect to disease prevention than the Food Guidance System graphic, they will not be able to include complex medical conditions that some individuals may be experiencing.

However, providing individual guidance through a mass media channel such as CD ROM or World Wide Web is problematic from the standpoint of having complete and correct information upon which to base the individual guidance. There is also the element of liability to consider. Can a program delivered to the general public through these media possibly include every potential individual nuance that may impact nutrition recommendations? Providing individualized recommendations and personalized diets

Litchfield 3 of 3

using CD ROM or World Wide Web technology is much like practicing medicine without seeing the patient.

*Channels of delivery for the Food Guidance System.*

The most efficient and effective ways to reach consumers will be a combination of print and internet-based materials. Although there has been an explosion of technology and internet-based information dissemination, segments of the population do not have access to this form of media. It is important, if not critical, to provide no- or low-cost print materials for agencies and professionals working with these populations. A careful assessment of accessing these populations needs to be done to evaluate appropriate channels to deliver the messages. With the advent of EBT cards and extended periods of enrollment for programs such as WIC and Food Stamps, other channels of contact must be found. Channels that might reach the target audience include grocery stores, gas/convenience stores, mass transit and television. A primary channel appears to be television and regardless of the expense is an important option to consider.

Sincerely,



Ruth E. Litchfield, PhD, RD, LD  
State Nutrition Extension Specialist

**Caryn Hartglass**

Forest Hills, New York

8/24/2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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AUG 30 2004  
ack

Hartglass / 1 of 2

Dear Food Guide Pyramid Reassessment Team:

The present food pyramid along with high powered advertising are part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged.

The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines.

The TRUTH is needed- some will follow and some will not. We cannot change everyone. Some will eat what they want with no consideration of their health. People that want to improve are confused and need guidance, they need the truth. There are many diet books out there that do not work long term, this is why there are so many - because they do not work. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation.

This change in the food pyramid should not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that do not come in packages. These contain a large amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease.

The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

The Following Pyramid Is Proposed

pa, marked 8/26/04

Hartglass 2 of 2

The base should be the maintenance of energy, having an exercise program and controlling calories and weight.

The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.

The next level should be whole grains and starchy vegetables.

The next level should be legumes, beans, peas, sprouted nuts and seeds.

The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources, with no more than 20-30% of our calories coming from these healthy fats.

6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt ( no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.


7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.

8. If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the WHO's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet.

9. A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

I highly recommend using the book "Eat to Live" by Dr. Joel Fuhrman as a reference. Dr. Fuhrman would be an excellent person to consult with to come up with the ideal Food Pyramid. He can be reached at: 908-237-0200.

Sincerely,

  
Caryn Hartglass



To: Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

341

AUG 30 2004  
ask

From: Paula Wood

Shoreline, WA  
Ph:  
Email:

(Wood) 1 or 2

The present food pyramid along with high powered advertising is part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged. I see this in my work as a nurse.

The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time; our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines.

The TRUTH is needed- some will follow and some will not. We cannot change everyone. Some will eat what they want with no consideration of their health. People that want to improve are confused and need guidance, they need the truth. There are many diet books out there that do not work long term; this is why there are so many- because they do not work. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation.

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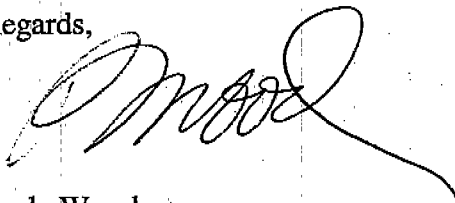
The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

The Following Pyramid Is Proposed

Wood 2 of 2

1. The base should be the maintenance of energy, having an exercise program and controlling calories and weight.
2. The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.
3. The next level should be whole grains and starchy vegetables.
4. The next level should be legumes, beans, peas, sprouted nuts and seeds.
5. The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats.
6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt ( no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.
7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.
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9. A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds are the healthiest way to eat.

Regards,



Paula Wood

(original author; Jackie Graff, R.N., B.S.N.)

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Release No. 0281.04

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## Comments to the USDA Food Guidance System Reassessment Team

by Saurabh F. Dalal

Thank you for the opportunity to voice our comments in an area of tremendous importance: the update of the Food Guidance System to educate the public on healthy diets and lifestyles.

These comments are presented on behalf of three non-profit organizations:

- The International Vegetarian Union ([www.ivu.org](http://www.ivu.org))
- The Vegetarian Union of North America ([www.ivu.org/vuna](http://www.ivu.org/vuna))
- The Vegetarian Society of DC ([www.vsd.org](http://www.vsd.org))

Vegetarian foods offer powerful advantages and are best for humans. So many studies have shown, and proven, the remarkable health benefits of a vegetarian diet. Animal products are the main source of saturated fats and the only source of cholesterol in the diet. Animal products contain no fiber and we know fiber helps reduce cholesterol levels. We claim that a well-planned, low-fat vegetarian diet – actually a vegan diet where no animal products whatsoever are consumed – is the best diet for humans. Preventing and actually reversing heart disease, preventing certain cancers, preventing and reversing diabetes, lowering blood pressure, and helping manage weight are some of the successes of such a diet, and there are many many more.

The American Dietetic Association in its 2003 position paper on vegetarian diets states: Well-planned vegan and other types of vegetarian diets are appropriate for all stages of the life cycle, including during pregnancy, lactation, infancy, childhood, and adolescence. Vegetarian diets offer a number of nutritional benefits, including lower levels of saturated fat, cholesterol, and animal protein as well as higher levels of carbohydrates, fiber, magnesium, potassium, folate, and antioxidants such as vitamins C and E and phytochemicals. Vegetarians have been reported to have lower body mass indices than nonvegetarians, as well as lower rates of death from ischemic heart disease; vegetarians also show lower blood cholesterol levels; lower blood pressure; and lower rates of hypertension, type 2 diabetes, and prostate and colon cancer.

The Unified Dietary Guidelines developed by the American Cancer Society, the American Heart Association, the National Institutes of Health, and the American Academy of Pediatrics call for a diet based on a variety of plant foods, including grain products, vegetables, and fruits to reduce the risk of major chronic diseases.

postmarked 8/27/04

Dalal 2 of 9

And your group, the USDA in its 5<sup>th</sup> ed of the Dietary Guidelines for Americans in 2000, states: "Vegetarian diets can be consistent with the *Dietary Guidelines for Americans*, and meet Recommended Dietary Allowances for nutrients." They give recommendations on meeting nutrient requirements for those who choose to avoid all or most animal products.

Support for vegetarian diets is established and strong. Contrast this to the trends with animal-based food today: high in saturated fats, trans fats, cholesterol, and food contaminants and the results are heart disease, cancers, strokes, diabetes, obesity, and food illnesses.

If the Food Guide Pyramid is to continue to emphasize specific nutrients, as in the cases of calcium and protein, represented by the Milk (etc) Group and Meat (etc) Group, then the updated pyramid and graphic could demonstrate the above important positions by illustrating plant foods and meat/dairy alternatives more prominently. The groups should be renamed something akin to the Calcium (etc) Group or the Protein (etc) Group. Not only can plant products provide calcium and protein along with all the nutrients needed, they are typically lower in saturated fats and contain no cholesterol. Plant foods are then indeed better sources.

The Food Guide Pyramid could alternatively be updated without emphasizing food groups for any specific nutrient like for calcium or protein. Then a broad variety of plant foods consisting of whole grains, whole fruits, vegetables, legumes, nuts, seeds, and fortified cereals and juices can be depicted to help ensure a healthy, well-balanced diet – more in-line with the way the lower two levels of the pyramid are today with the Bread (etc) Group as well as the Fruit Group and Vegetables Group. An emphasis on consuming a wide variety of plant foods would take care of all nutrients being included in the diet.

The key is removing the emphasis on animal derived foods in favor of plant foods, with a well-represented vegan diet being optimal.

A few reminders on nutrition and health specifics:

1. A diet drawn from varied plant sources easily satisfies protein requirements, without the potential for protein excess. Plant sources provide all essential amino acids, even without intentional combining or "protein complementing" as long as calorie intake is adequate. Good protein sources include cooked beans, tofu, soy yogurt, tempeh, seitan, nuts, seeds, and whole grains. Soy protein has been shown to be nutritionally equivalent in protein value to proteins of animal origin.
2. Many plant-based sources of calcium exist. Examples are fortified soy or rice milk, fortified juices like orange, cranberry, or apple juice; dark leafy greens like collard greens, mustard greens, turnip greens, kale, broccoli; blackstrap molasses; tofu processed with calcium sulfate, and tempeh. The more extensive range of dietary sources of calcium from plant foods would increase intakes of boron, vitamin K, and magnesium, helping reduce the risk of osteoporosis.

Let's not forget that calcium absorption and bio-availability from these foods has been shown to be excellent, better than dairy foods.

Also very important is that each serving of these plant-based sources of calcium also counts towards choices from one of the other food groups, e.g. cooked leafy green vegetables count as a serving from the calcium-rich foods group AND in the vegetable group. This is an added benefit, showing the versatility and benefit of plant-based foods.

3. Animal products force calcium out of the body and so promote bone loss. Again well-planned vegetarian diets can yield a lower risk for osteoporosis.
4. Iron is plentiful in beans, whole grains, and fruits.
5. Flax seeds are an excellent source of omega 3's whereas fish and consumption of other sea animals have the downside of potential mercury content, other contaminants, and significant cholesterol.

Now a few broad observations:

1. Eating patterns are changing and the diets of a great many are more plant-based than a decade ago, including vegetarians (with a proportionately high % of vegans), and many quasi-vegetarians. There is tremendous interest around vegetarianism and the USDA guidelines must address the needs of those moving away from animal products.
2. The eating patterns of many people who do not use milk and dairy products, for ethnic, health, and/or ethical reasons, need to be reinforced by guidance that is more comprehensive in terms of alternatives to animal foods.
3. In the greater societal context, what's better for the individual in terms of vegetarian foods is also what's best for the health of the country and planet. The key characteristics are natural, healthy, sustainable, and economically viable. We must look at our system of food production with its enormous inefficiencies and the tremendous toll it takes on people, increasingly scarce resources, and the living world around us. Let's favor the 12-16 pounds of grain instead of the 1 pound of beef that results; let's favor 25 gallons of water for 1 pound of wheat rather than over 5000 gallons needed for 1 pound of beef; let's favor 40,000 pounds of potatoes on 1 acre of land instead of 250 pounds of beef on that same acre; let's favor soybeans that are 38 times more energy efficient than beef – the numbers are truly this staggering and these are just a few facts to give an indication.

We represent many people, growing greater and greater in numbers, throughout this city, and this country as well as around the world that believe that a simpler, wholesome, well-planned, vegetarian diet that consists of no animal products is the right type of guidance to establishing healthy eating habits through the daily selection of foods. Let's make sure we're doing our utmost to make the lives of our citizens far better and also recognizing and improving on the way we impact the world, and in turn, ourselves.

We urge the Reassessment Team to incorporate even more vegetarian foods, specifically a well-planned, low-fat, vegan diet, with its remarkable benefits in all respects, as you update the Food Guidance System including the Pyramid, and the Dietary Guidelines for Americans.

THANK YOU FOR YOUR CONSIDERATION.

Sincerely,

  
Saurabh F. Dalal

Secretary, The International Vegetarian Union ([www.ivu.org](http://www.ivu.org))

Secretary, The Vegetarian Union of North America ([www.ivu.org/vuna](http://www.ivu.org/vuna))

President, The Vegetarian Society of DC ([www.vsd.org](http://www.vsd.org))

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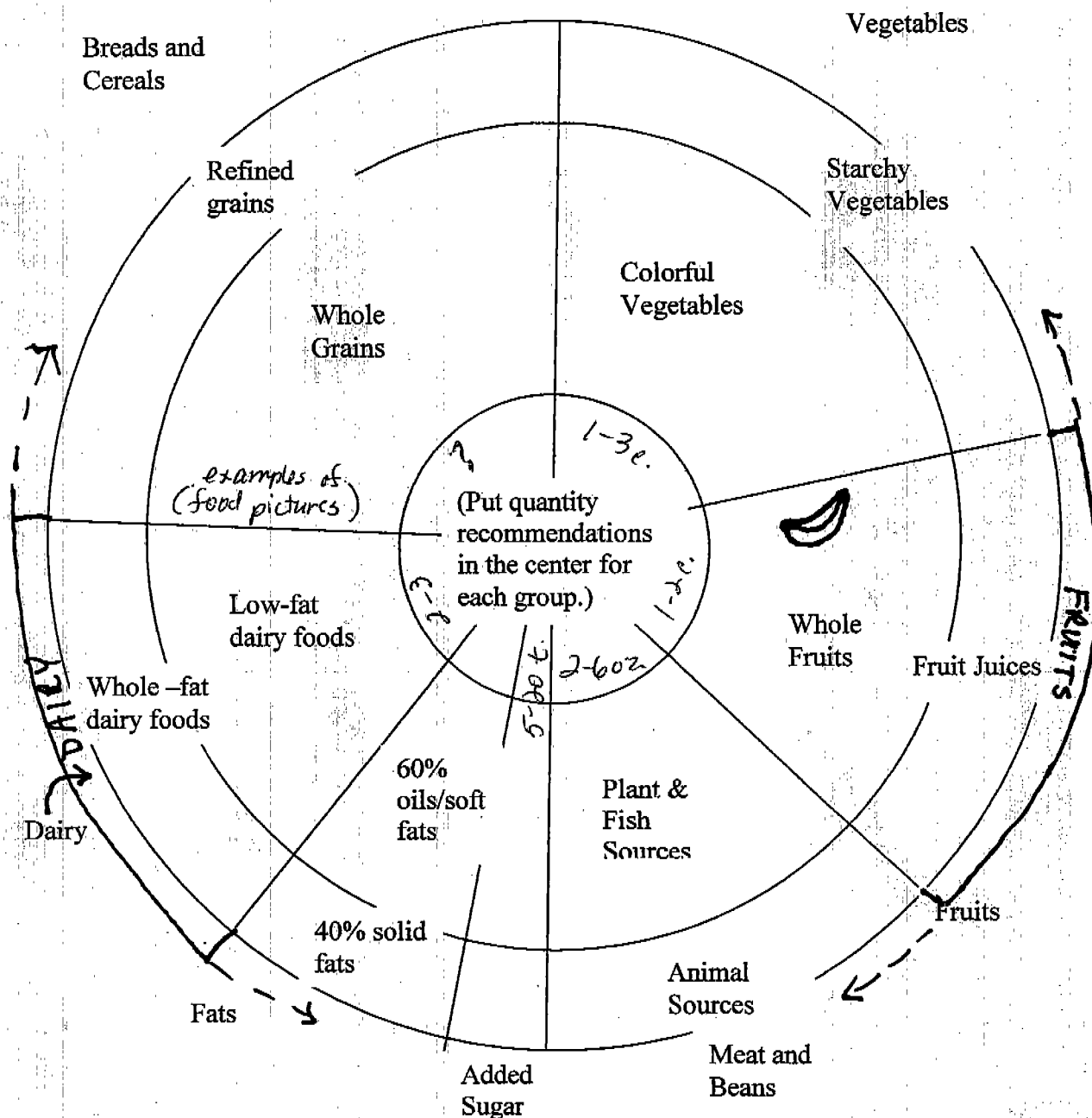
Suggestion for a Food Guide Model

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Aim For Healthy Food Choices  
with the  
Food Guide Target

May 1 of 1

Univ. of Minnesota  
Extension Service



Jill May

portmarked 8/26/04

August 20, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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Nowak 1 of 2

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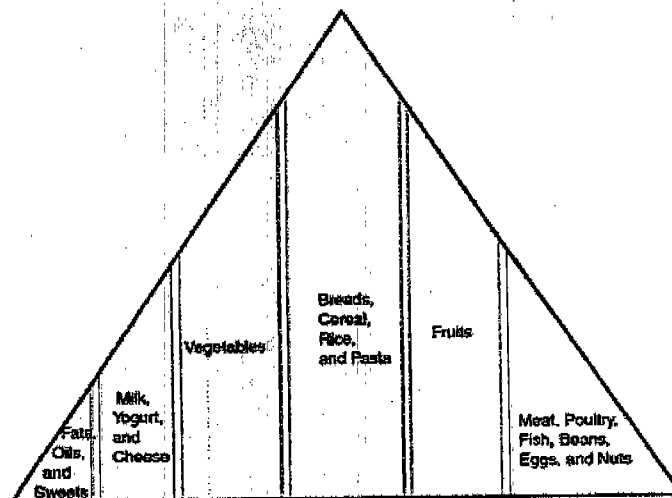
Dear Sir or Madam:

I would like to submit to you my ideas on the redesign of the Food Guide Pyramid. I agree with statements made that the previous marketing and recognition of the pyramid is extremely valuable and should not just be thrown away. However the fact that the foods that should be consumed less are in a position of prominence on the peak of the pyramid I believe is misleading.

Therefore, I propose that you keep the same triangular shape yet rearrange the contents to change the focus of the food within. To illustrate, instead of having a four-tiered system where the major foods are at the bottom and the foods to eat sparingly are given prominence at the top like is illustrated in the current chart:



I think that it would be beneficial to arrange the figure so that the foods that should be highlighted and eaten more are in a centralized location and foods such as fats, oils and sweets are at the bottom in less prominent positions.



postmarked 8/25/04



Nowak/2 of 2

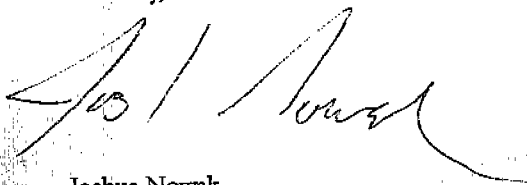
August 20, 2004

Another feature I think that would be beneficial is to put this icon which people are familiar with on food labeling by the nutrition information. Use the graphic that people are familiar with to show them how much of a food group they are actually eating with each serving of that food. For instance, you might have the nutrition information label say what the service size of the food is then have the new icon showing what percentage of the daily requirement/allotment is filled by that food.

So if something fulfils one of the 3 servings of milk, yogurt or cheese, then that column on the new food pyramid would be shaded one third of the way with a darker color. One of the biggest things keeping people from following the food guide is that it is too obscure to them. I consider myself as someone who tries to eat healthy and if you asked me what a serving of bread was or a serving of dairy, I wouldn't know. But if I saw that icon on every item of food that I buy and the chart filled in saying that the serving size on the food was  $1/3$  or  $1/4$  what I should eat for the day, I would start to get a feeling for what I should eat.

Thank you for your consideration, I hope my thoughts are useful in your changes.

Sincerely,



Joshua Nowak

1/

August 27, 2004

To:

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy And Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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AUG 30 2004  
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Keefe/lac3

I am very much in favor of 80 percent raw vegan living foods, especially those foods as advocated by Jackie Graff in her position statement written by her (see below). Referring to No. 5 level (see below) I would recommend as low as 15 to 20 percent of calories that should come from uncooked, not-so-dry healthy fat sources such as avocados, durians, and baby coconuts and their core liquid. Only a handful of commercial nuts or a tablespoon or two of seeds would be accepted infrequently. Nuts not yet dehydrated and directly picked from trees can be eaten more during the season.

As written by Jackie Graff of Roswell, GA:

The present food pyramid along with high powered advertising are part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged. I see this in my work as a nurse.

The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices -- just give us the truth. Enough studies are out there that prove the following proposed guidelines.

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Keefe 2 of 3

This change in the food pyramid should not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that do not come in packages. These contain a large amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease.

The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

### **The Following Pyramid Is Proposed**

1. The base should be the maintenance of energy, having an exercise program and controlling calories and weight.
2. The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.
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7. What professional in the health and nutrition field is telling us is that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet. These foods cause inflammation and can only lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten, then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.

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Keefe 3 of 3

8. If enough of the levels two through five are eaten to maintain energy and a healthy weight, there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (Refer to the WHO's recommendations for protein needs.) Animal protein and fat are not necessary for a healthy diet.

9. A plant-based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Submitted by

*Dean W. Keefe*

Dean W. Keefe

Burke VA.

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Ormsley 1 of 4

AUG 30 2004  
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July 22, 2004  
Shizuoka, Japan

To the Food Guide Pyramid Reassessment Team

Dear Sirs and Madams,

I am writing to recommend a flexible or multiple-pyramid approach to dietary recommendations. In particular, I have benefited and seen how others have benefited by the approach recommended by Dr. Robert Atkins. I'm certain you are well aware of this approach. In fact, I am writing a book in Japanese to introduce this approach to Japan, where diabetes is increasing rapidly. One nutritionist here told me that only 3% of diabetics in Japan respond well (i.e., show improved health and find it comfortable enough to be able to continue) to calorie restriction following the current carbohydrate-heavy pyramid. Meanwhile, my husband, who used to be severely diabetic, has improved greatly with a moderate degree of carbohydrate restriction. I am a marathoner and find even severe carbohydrate restriction in no way impedes my performance. I used to follow the current pyramid's high-carbohydrate suggestions, but hit a metabolic wall and found that in order to keep from gaining weight I had to restrict calories to the point that I was miserable and frankly undernourished. The nutrient-dense foods I eat under the Atkins approach fulfill my needs without provoking hunger, and allow me to restrict calories to the degree I currently need.

On the other hand, I know many strict vegetarians who are clearly healthy and happy with that approach. People have differing metabolisms and philosophies, and have different food needs.

I think, however, that you will see more and more people turning to carbohydrate restriction as the only solution to their problems. My inability to metabolize carbohydrates well is not an inherited disorder. It's environmental.

My family have all been slender except for those working in environments with high levels of electromagnetic radiation: my father at the

Ormsby 20F4

airport, who slimmed down when he retired; cousins who got into computers early on. These same people are also showing a high incidence of diabetes. There exists a body of empirical evidence of effects from electromagnetic fields on metabolism both in vivo and vitro. Please see the enclosed abstracts.

Basically, because of IT, we are all subjected now to the kind of environment that used to be encountered only at airports and military facilities. I think this is one factor accounting for the world-wide increase in obesity during the past decade. The only thing we can do about it is educate people one-by-one and build a consensus for improvement. But the impediments to this are enormous. Consider how many companies would be commercially liable and how many governments would be criminally liable if biological effects were acknowledged. I wouldn't hold my breath.

It would be politically more expedient to acknowledge the Atkins approach, thus giving people another way to salvage their good health, without the sticky problem of acknowledging effects from electromagnetic fields.

Good health to you!

Patricia A. Ormsby

[Electric words MAIN INDEX]

Ormsby 3049

## EMF Health-effects Research

Note: All research, both independently-funded and industry-funded, is now included in this section

### Phasic behavioral and endocrine effects of microwaves of nonthermal intensity

Navakatikian MA, Tomashevskaya LA,  
In "Biological Effects of Electric and Magnetic Fields, Volume 1"  
D.O. Carpenter (ed) Academic Press, San Diego, CA, 1994, pp.  
333-342

Microwaves at nonthermal levels are able to induce behavioral and endocrine changes at low power densities (0.01-0.1 mW/cm<sup>2</sup>).

Our studies have demonstrated several phases of inhibition and activation. We suggest that inhibition of behavior by microwaves has many mechanisms depending on the strength and duration of exposure, and most inhibitory effects from direct actions on the nervous system.

Activation, on the other hand, is correlated well with decreases in serum concentrations of testosterone and insulin. CW microwaves, however, have no influence on the secretion of insulin.

ABSTRACTS INDEX

GENERAL EMF/CELLPHONE INDEX

INDEX OF PARTICIPANTS

Please e-mail comments, information and updates to Stewart Fist

[Electric words MAIN INDEX]

Ormsby York

## EMF Health-effects Research

Note: All research, both independently-funded and industry-funded, is now included in this section

### Disturbances of glucose tolerance in workers exposed to electromagnetic radiation

Bielski J, Sikorski M,  
Med Pr 47(3):227-231, 1996.

[Article in Polish]

The study group was composed of 50 workers exposed to electromagnetic radiation (radiowaves). Out of them 31 persons (62%), employed mostly in the risk zone, showed irregular glycaemia after oral administration of 75 g of glucose.

At normal blood sugar before breakfast, the glycaemia level was high following administration of glucose and it did not return to starting values after 2 hours. After 30 min from glucose administration the level accounted for 155 mg%, after 60 min-180 mg%, after 90 min-153 mg% and after 120 min-124 mg%, on average.

In 10 persons (32%) with glucose tolerance disturbances, disorders in bioelectric activity of the brain (abnormal EEG record) were observed.

ABSTRACTS INDEX

GENERAL EMF/CELLPHONE INDEX

INDEX OF PARTICIPANTS

Please e-mail comments, information and updates to Stewart Fist



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Julia Jackson

Collegeville, PA

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

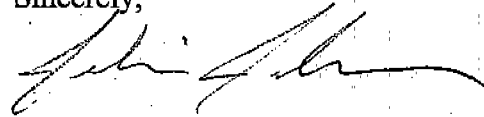
Jackson  
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To Whom It May Concern:

I would like to see some sort of rating of fullness factor to calories associated with food. So, for example, one end of the scale would be soda, which has lots of calories, but doesn't fill you up at all. Whereas something like peanuts has lots of calories but also fills you up.

Sincerely,



Julia Jackson

Postmarked 8/26/04

BETH PREISS

Washington, DC

August 25, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

348

Preiss

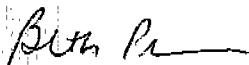
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The food pyramid is a widely recognized tool for promoting healthy food choices, and I appreciate this opportunity to provide comments to make it even more accurate and effective.

- The name "milk, yogurt, and cheese" is misleading. Healthier sources of calcium such as leafy green vegetables should be included and emphasized, and the group should be renamed.
- Similarly, the "meat, poultry, fish, dry beans, eggs, and nuts" group should focus on the healthier plant-based sources of protein – beans and nuts – in both text and graphics.
- Continue to recommend a diet with plenty of vegetables and fruit and low in saturated and trans fat and cholesterol. Emphasize whole grains, fruit, and vegetables over processed foods.

As more Americans choose vegetarian and vegan diets to protect their health, the animals, and the planet, it is vital that the food pyramid fully reflect the options and benefits of a plant-based diet.

Best regards,



Beth Preiss

postmarked 8/27/04

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August 25, 2004

Paula Ferracuti

Toronto, Ontario  
Canada

August 25, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

To Whom it May Concern,

My name is Paula Ferracuti and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

I have tried many diets and have hit a plateau on all of them leading me to the next one to find results. All of them left me craving more food and feeling hungry as I consumed far too many carbohydrates. Two weeks ago I started Atkins and immediately felt satisfied with the amount and content of food I was eating. I lost four pounds after eleven days and I am looking and feeling great as I am five pounds away from my goal weight of 116 pounds. I no longer crave sugar and enjoy low carb products on the market.

My comments are as follows: I believe that the current food guide pyramid has left me tired, cranky and craving sugar. Even when I worked out vigorously for an hour or more 5 days a week, I would not lose weight. Atkins has changed my life. I see something valuable to pass onto my own children in the future.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,  
Paula Ferracuti

Ferracuti  
10/1

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Washington, DC  
August 24, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

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Se used 1 of 2

Dear Madam or Sir:

I am writing in regard to the pending revision of the food pyramid. I am a private citizen who grew up on a farm in Kansas that supported a beef feedlot with very common crops, such as corn, milo, and wheat. I am 44 years old, and for the past two years have eaten a raw vegan diet that has supported the healthy revitalization of my body that has left me weighing 160 pounds, at a height of 5'11". In my last very thorough physical exam, all of my test results came back in the ideal range. For example, my blood pressure was 70 over 40. My physical condition is nearly ideal, and I have tremendous energy and sleep soundly every night. Most people who see me assume I am in my early 30s or late 20s, and I continue to look younger and feel better every year. I lift weights, run, and do yoga on a regular basis.

In contrast, most of my family continues to consume a standard American diet that in most ways follows the current food pyramid guidelines. My brother, who is 39, is about 75 pounds heavier than I am, and looks much older than me. My father (still a farmer) weighs about 100 pounds more than I do, and although he is strong as a horse, will not be able to function well in old age with his heavy weight. My mother suffers from extensive blockage of her arteries, heart disease, and diabetes. All of my first cousins my age, except one, on both sides of my family are overweight or obese, and their bodies are aging remarkably. All have refused or found it difficult to make significant changes in their diet that even mainstream medical studies have shown would radically improve their health and well-being.

USDA's current food pyramid provides little guidance about foods that are the most nutritious and promote good health. Instead, it promotes the interests of various industry groups without regard for the health of the American people. As a result, our national health is seriously affected, and with it, our national economy, as more and more dollars are poured into unproductive health care solutions to our self-inflicted medical problems caused fundamentally by our unhealthy diets and lifestyle choices.

As a result, we are on a collision course with a decline of our nation, as individuals at an ever younger age develop significant medical problems that require ongoing and expensive treatment that our nation cannot afford to support on such a broad basis. Our food supply is dangerous, causes malnutrition, and is killing us.

The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines.

The TRUTH is needed - some will follow and some will not. We cannot change everyone. Some will eat what they want with no consideration of their health. People that want to improve are confused and need guidance, they need the truth. There are many diet books out there that do not work long term, this is why there are so many- because they do not work. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation.

This change in the food pyramid should not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that do not come in packages. These contain a large

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Seuser 20F2

amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease.

The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

The following food pyramid is proposed:

1. The base should be the maintenance of energy, having an exercise program and controlling calories and weight.
2. The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients.
3. The next level should be whole grains and starchy vegetables.
4. The next level should be legumes, beans, peas, sprouted nuts and seeds.
5. The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats.
6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt (no more than 1000 mg /day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.
7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy.
8. If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the WHO's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet.
9. A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Please consider this proposal if only for the well-being of our children and grandchildren. Even if you cannot fathom making these healthy food choices for yourself, kids who are raised on healthy foods and are not exposed to unhealthy alternatives thrive remarkably and have no interest in the junk food that other kids subsist on. Their lives will be immeasurably improved as a result.

Thank you for your consideration of this proposal.

Sincerely,

*Steve Seuser*  
Steve Seuser

351

August 25, 2004

To: The Food Guide Pyramid  
Reassessment Team  
USDA

Rochelle  
1 of 1

AUG 30 2004  
ast

From: Paula Rochelle

Saratoga, CA

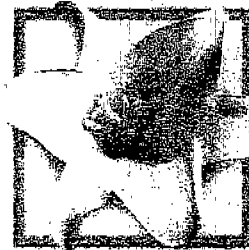
Please create a pyramid based on  
science, not politics and special interest  
lobbies.

Have a protein group which includes  
vegetable sources, and a "calcium"  
group with various vegetable as  
well as dairy sources of calcium.

Do not let the meat and milk lobbies  
create a meaningless pyramid with  
no scientific basis.

Paula Rochelle

postmarked 8/26/04



Food Guide Assessment Team:

U.S. Center For Nutrition Policy and  
Promotion  
3101 Park Center Drive  
Alexandria  
Va. 22302

352

With 6-11 You're Twice as Right

By Helen Andrews

Falmouth  
Me.

Andrews  
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8/24/04

Re: Food Guide Team

Fr. Nancy Vaillancourt

353

Elly Jay, JA

postmarked 8/24/04

Dear Team,

Please find some way  
to bring attention to the over  
abundance of salt in EVERY  
THING!! in canned products,  
boxed prepared foods, frozen  
prepared dinners, crackers,  
cookies, canned & dried soups.

It is my understanding  
that the body needs between  
1100 - 2500mg of salt per day.

I have had to watch very  
carefully my salt intake for  
many years, trying to keep  
it at the 1100 <sup>down to</sup> 300 mgs.  
It is very difficult. I make



Vaillancourt  
2012

all my meals as salt free  
as possible - soups, fresh  
or frozen veggies only -  
no meats that have been  
injected with "chicken broth."  
(Just more salt & preservative)

No salted chips, pretzels, nuts,  
etc.

Salt needs to be a no-no  
along with sugars, fats & the  
white flour products.

Good Luck with your  
project

Nancy Vaillancourt

(354)

Weaver 10-1-2004  
A note from  
Wesley Weaver  
Anne P. Weaver  
4/16/30 2004

On your pyramid in  
the meat group -

I hope you will emphasize  
healthier sources of protein  
such as - plant based  
sources like beans & nuts

Change the milk group to  
Calcium group and include  
dark green leafy vegetables  
one of the healthiest sources  
of Calcium.  
Thanks



Mr. & Mrs. W. Weaver  
Winston Salem, NC

Wesley M. Weaver  
Anne P. Weaver

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8/26/04  
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Kraft Foods

J. Edward Thompson  
Chief Food Law Counsel

Thompson / 10F3

AUG 30 2004  
af

August 27, 2004

VIA OVERNIGHT MAIL

355

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22303

RE: Proposal for Food Guide Graphic Presentation and Consumer  
Education Materials; Opportunity for Public Comment  
69 *Federal Register* 42030 (July 13, 2004) Notice

Dear Sir/Madam:

With net revenues for 2003 exceeding \$31 billion, Kraft Foods Global, Inc. (Kraft) is the largest food manufacturer in North America and the second largest worldwide. Our well-known brands are found in more than 99% of all U.S. households and are sold in 150 countries around the world. The consumer trust we have built over the last 100 years is priceless and critical to our company's continued success. As part of our ongoing commitment to consumers, we have provided public nutrition communication programs to advance consumer knowledge for the last three decades. Accordingly, Kraft has a very substantial interest in the development and implementation of effective nutrition communication tools that provide meaningful information to help American consumers achieve their personal dietary goals.

Kraft is committed to health & wellness, and as a result, the company is implementing a wide-ranging program to improve the nutrition profile of the portfolio, while providing consumers with more information to help them make informed food and activity choices. Our communication efforts and nutrition education materials have been based on the guidance presented in Dietary Guidelines for Americans and the Food Guide Pyramid. These materials help consumers make informed choices and see how specific foods can fit into a nutritious diet. Furthermore, health professionals and educators request nutrition education materials from Kraft for use with their clientele. We appreciate the opportunity to share some of our insights from consumer use of these materials to facilitate the development of the proposed food guidance system.

**The Food Guide Pyramid is a useful graphic tool**

The food industry, nutrition educators, teachers, and the media have used the Food Guide Pyramid as a tool to graphically illustrate dietary recommendations since 1992. The

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shape of the food guidance system should be a visual reinforcement of the recommended proportion of food choices. Since the Pyramid seems to be a shape that most effectively illustrates the recommended types and amounts of food groups, we see no reason to change shape, especially given the widespread recognition of the Pyramid. However, we believe there is an opportunity to enhance and clarify the core messages. Most importantly, consumers need clarification on how much they should eat from each food group, based on age, sex, and activity level. In particular, it appears that most consumers do not understand that food guidance servings, as depicted in the Pyramid, are designed to promote selection of foods with similar nutrient content within a food group (i.e., a "serving" of milk is 1 cup, which has the same amount of calcium as a 1.5 ounce "serving" of natural cheese or a 2 ounce "serving" of process cheese). We suggest that food guidance "servings" should be listed in common household measures (cups or ounces) to avoid ambiguity over what constitutes a "serving."

### **There is a need for personalized, interactive tools**

Given the complexity of messages the food guidance system attempts to convey, we fully support the development of personalized, interactive tools that consumers can use to identify appropriate food choices based on their age, sex, weight, height, level of activity and personal preference. The "one-size fits all" approach for nutrition guidance may not be most effective or motivating to consumers.

Personalization can help consumers internalize nutrition messages, especially if the information is easily accessible and inviting. We offer many interactive tools on our web site ([www.Kraftfoods.com](http://www.Kraftfoods.com)) that engage consumers and allow more active participation than simply reading static articles. For example, in one month we had 90% more customers use our BMI calculator tool (where consumers enter their height and weight and their BMI is calculated and displayed) than those who read an article on healthy body weight posted on our web site; likewise, there are 99% more page views for the Personalized Meal Planner than page views for articles about the Food Guide Pyramid or Dietary Guidelines for Americans on our web site.

In addition to personalization, customization to demographics is very important. For consumer messages to be actionable, they need to be available in the appropriate language, they should be culturally relevant, and applicable to consumers of different age, sex and activity levels, as well as applicable to consumers with different degrees of knowledge and interest in overall health and wellness. Therefore, we support the use of twelve targeted calorie patterns that account for the different nutrition and activity needs for children, adults and senior citizens. If this broader approach is used in conjunction with an interactive tool, consumers will be assigned to the appropriate calorie pattern and can obtain a recommended calorie level and set of food group servings that appear personalized. To make the most impact, this tool should allow consumers to plan and rate their food choices based on their personal taste preferences.

The following section lists some suggestions for an interactive tool:

Thompson 3 of 3

- Allow consumers to compare the shape of their actual daily food choices to the recommended shape of the Pyramid to provide the consumer with visual feedback. For example, if a consumer selects too many fats/sweets, then the Pyramid would be inverted; if the consumer chooses too many servings of meat or dairy, then the Pyramid would bulge in the middle. Thus, the consumer can literally see that their food choices should be adjusted to correspond with recommended servings from the various food groups.
- Allow consumers to build a plate visualizing their actual food choices for the meal or day. Applying the general rule that  $2/3^{\text{rds}}$  of the plate should be plant-based and  $1/3^{\text{rds}}$  animal based, the consumer can see at a glance if they've achieved the recommended ratio.
- Include an activity tracker that allows consumers to visualize how their food patterns change based on physical activity. Since the goal is to encourage consumers to exercise more, they could see how physical activity earns them flexibility in extra food choices through "discretionary calories," without exceeding their total caloric intake.

### Conclusion

Kraft believes the interactive tool is a step in the right direction, but it is only as good as the guidance system itself. The core messages should apply to the population at large, and the interactive tools should reinforce these messages and apply them on an individual basis. While the interactive tools will work well for those consumers who have computer access, the materials should also be made available in a variety of formats so all consumers have equal access to this important information.

Kraft acknowledges the critical role the government plays in translating strong science-based findings into consumer-focused dietary advice and nutrition education. The food industry, along with many credible organizations and professionals, rely on authoritative government bodies to develop the foundation upon which we can develop additional nutrition communication and education materials. We encourage the timely completion of the food guidance system and its wide dissemination in a well-tested communications campaign.

Respectfully submitted,



J. Edward Thompson

Brooklyn, NY  
August 26, 2004  
Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

To Whom It May Concern:

It has come to my attention that the USDA is currently reassessing its food guide pyramid for the first time in twelve years. It has also come to my attention that the USDA is encouraging public opinion. I thought this would be a good opportunity for me to voice my opinion in a subject that is very important to me.

It is well known that the National Cattlemen's Beef Association, as well as the Poultry Times and American Meat Institute, have been pushing to fill the pyramid with more meat; claiming that American youth does not eat enough meat. There is also an announcement on the Atkins Diet web site encouraging its followers to write in and promote a meat-based diet. I feel compelled to add my voice in protest.

I would encourage you to change the "Dairy" section to a "Calcium" section, which includes dark green vegetables. Dark green vegetables such as spinach, escarole and broccoli have high amounts of calcium without the fat, pus and bacteria found in milk. I would also encourage you to change the "Meat" section to a "Protein" section, which contains tofu, seitan and tempeh. These protein rich foods offer the same health benefits of meat without the risk of heart disease, high cholesterol and arteriosclerosis.

I hope you will weigh all the options, and follow the facts, to make the most health conscious food pyramid yet.

Best regards,  
Lindsay Sargent

Pratt Institute

(Sargent) 1 of 1

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August 27, 2004

South Dennis, MA

AUG 30 2004  
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To

The Food Pyramid reassessment team

Sidhartha  
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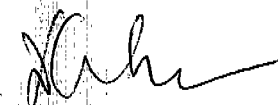
Dear Sir/Madam,

I would like to express my comments/suggestions for the final version of food pyramid guide being prepared as part of nutrition guidelines for the public. Being a physician myself, I had seen tremendous health benefits in my patients when they switch to a diet rich in whole grains, plant-protein sources like nuts, legumes & vegetables and when they reduce the intake of animal – protein and dairy products.

Based on increasingly available medical data that support the beneficial effects of fiber rich diet (which includes fruits, vegetables & whole grains and which excludes meat & dairy), I would like to suggest a food pyramid guideline that includes whole grains, nuts and vegetables as alternative protein sources and use of green leafy vegetables as an alternative option to dairy for calcium source in the diet.

Thank you,

Yours truly,



Kumara Sidhartha, MD

South Dennis, MA

postmarked 8/22/04

(358)

August 26, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Coyne

Hello,

I am writing with suggestions for changes in the Food Pyramid. My first suggestion is that you include sources other than cow's milk in the calcium rich food group. As someone who does not drink milk emphasizing foods such as kale, beans, tofu, collard greens and almonds would help make the Food Pyramid much easier to use and relevant to my daily diet.

Also, I hope that you will increase the number of suggested servings of fruits and vegetables. Most Americans do not get the recommended five servings of fruit each day and emphasizing the importance of fruit and vegetable consumption should help to raise the amount of fruits and vegetables the average American eats.

Thank you for your time and consideration,

Kevin Coyne

Brighton, MA

postmarked  
8/22/04



Friday, August 27, 2004

359

Kennedy

1 of 1

AUG 30 2004  
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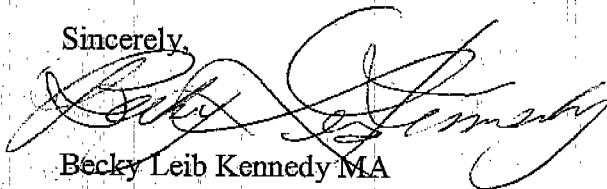
Dear Food Guide Pyramid Reassessment Team,

I am writing to urge you to consider the well documented benefits of a vegan diet when developing and promoting your nutritional literature. I understand that there are powerful industries that are lobbying you to feature animal based foods as the road to wellness. Just today I had the opportunity to tour a local hospital and the lab technician showed us a container full of Gall stones, all the result of a high animal fat diet.

I strongly want to encourage you to emphasize healthier plant-based sources of protein such as beans and nuts in their "meat" group, or better yet, change the name. Perhaps a change of the name the "Milk" group to the "Calcium" group and feature leafy green

I urge you to use the scientific research, such as Dean Ornish's work to base your nutritional advice rather than supporting industries that sell heart disease, diabetes, and cancer.

Sincerely,



Becky Leib Kennedy MA

San Diego, CA

postmarked 8/27/04

(360)

Mayagüez, PR

August 26, 2004

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria VA 22302

Macpherson-Sanchez  
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AUG 30 2004  
CAF

Dear Reassessment Team:

The Food Guide Pyramid was developed in 1992 and has been used by many people to teach their audiences or train their personnel regarding teaching nutrition. My job has been to train personnel. Although I understand the overall message of the pyramid I find it extremely difficult to get the people I train to see the overall message. Many of them get bogged down in the specifics.

The pyramid by its nature is designed to teach general concepts about nutrition. To be more specific there needs to be some way of measuring the caloric need of an individual, which is extremely difficult to do. Even if the specifics of portion sizes and number of portions according to individualized needs are not understood, if one follows the general concepts, and eats a variety of food from each group the result should be very close, over the long run, in meeting the nutritional needs of the individual.

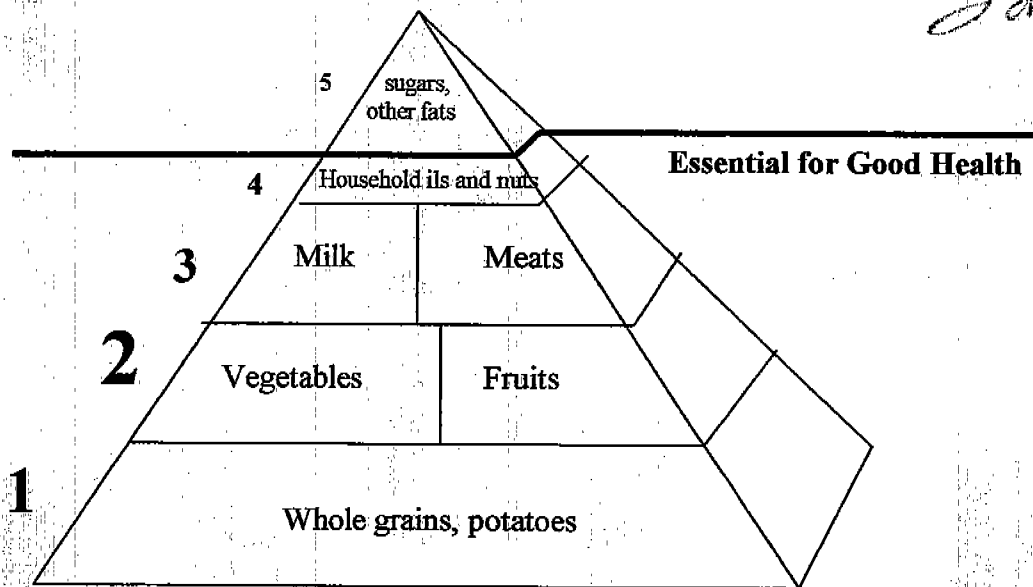
The main problem to following the good advice of the pyramid is that the graphic does not clearly show what is recommended, and there is hopeless confusion about fats, with many teaching that all added fats are bad, when the scientific literature makes clear that polyunsaturated fatty acids found in household oils and nuts are essential to health.

To remedy this situation I think that it is essential to make sure that they underlying conceptual basis of the pyramid is as clear as possible. In other words, if whole grains are preferred over enriched cereals this should be shown clearly in the graphic. If sugars are a demonstrably different kind of carbohydrate source, this should also be clear. Finally, if there is a difference in kinds of fats, this issue has to be addressed. Basically this means an alteration of the names of some groups, leaving out the dots and circles in the five main groups and adding oils/nuts to give essential fatty acids. Since oils sold for home use are chemically different from oils used in the food industry the label of the new group has to reflect that fat. Thus the tiers of the pyramid would be:

- 1: The foundation: For energy and the nutrients needed to use that energy
- 2: Protective foods: for vitamins, minerals, phytochemicals and fiber (eat lots)
- 3: Structural elements: to make strong bones, muscles, heart, lungs, etc in the body. We need enough, but not too much.
- 4: Oils and nuts: for vitamin E and essential fatty acids (include some)
- 5: Sugar, other fats: provide energy, but not the nutrients needed to use it. Therefore small quantities suggested.

postmarked 8/27/04

*Macpherson Sanchez*  
*Doc 2*



The above drawing represents a possible way of integrating these ideas into the pyramid structure. The numbers and their sizes were placed on the pyramid to indicate their order of importance.

I am well aware that food industry interests may dictate that the graphic and its underpinnings not be this clear. However, the current problem of obesity dictates that nutrition education be as clear as possible to prevent a greater problem in the future..

Thank you for your consideration of this suggestion

Sincerely

*Ann E. Macpherson*

Ann E. Macpherson-Sánchez, EdD  
Foods and Nutrition Specialist

(361)

August 26, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Sullivan  
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af

To whom it May Concern:

I have several suggestions concerning the development of the new Food Pyramid. My first suggestion is that in the protein group you encourage the consumption of protein sources such as beans, seeds, nuts and soy products (tofu, tempeh, etc.). These are all cholesterol free, low in saturated fat, and high in fiber. Additionally non-animal sources of protein have been found to reduce the risk of many diseases such as cancer, heart disease, diabetes, etc. People should be encouraged to eat these nutritious foods and to avoid foods high in saturated fat and cholesterol. Products such as beef, chicken and pork are linked to an increased risk of heart attack, cancer, diabetes, and many other diseases. I hope you will encourage people to choose nuts, seeds and beans over hamburgers and sausages.

Secondly, I request that the calcium rich group include products such as soymilk, calcium-fortified orange juice, tofu, leafy greens, broccoli, blackstrap molasses, soy yogurt and almonds. These foods all have a high calcium content and lack the saturated fat and cholesterol found in milk and cheese. With so many Americans either lactose intolerant or allergic to milk it seems necessary to emphasize that there are other sources of calcium than cow's milk.

Lastly I would appreciate it if you would differentiate between whole grains and processed grains. Whole grains contain fiber and other nutrients that processed grains often lack. Additionally whole grain consumption is also linked to a reduced risk of many diseases.

Thank you for your time and consideration.

Blakely Sullivan  
Blakely Sullivan

Brighton, MA

postmarked 9/25/04

362

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

AUG 30 2004  
ack

Kimura

10/1

Dear Food Guide Pyramid Reassessment Team:

Please change your "Milk" group to "Calcium" group and emphasize leafy green vegetables and soy. The vast majority of Asian Americans and African Americans are lactose-intolerant or lactose-allergic, as are a significant proportion of white Southern Europeans.

Moreover, with so much antibiotics, hormones, and pesticides in our milk, it is unnecessarily unhealthy even for those not lactose-intolerant or -sensitive.

The "Protein" group should emphasize beans and nuts rather than meat. Americans eat 2-3 times the RDA of protein and need to eat less protein.

High amounts of animal protein also cause calcium to leach from the body, thereby negating the high amount of calcium in milk.

Thank you for reading my comments.

Aloha,

*Amy Y. Kimura*

Amy Y. Kimura

Honolulu, HI  
Fri., August 27, 2004

postmarked 8/27/04

PENNSTATE



College of  
Agricultural Sciences

Cooperative Extension  
Philadelphia County

Philadelphia, PA

363

AUG 30 2004  
CAF

August 26, 2004

Joseph / AF1

Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, room 1034  
Alexandria, VA 22302

Dear Team:

The Nutrition Links program teaches low-income families how to make healthy food choices using the food guide pyramid as the primary teaching tool. As supervisor for the Philadelphia County program, I solicited response from our team of nutrition educators. Based on their experience in working with low-income consumers two team members, Allison Sapp and Arlene Wright, offered the following comments on updating the food guidance system, addressing the particular areas of interest.

**Configuration of the new graphic:** circle of health, pyramid steps to health, food guide tower to healthy eating or food guide building blocks.

**Strategies to improve awareness and motivation for using the information:** emphasize healthy eating as a way to avoid the expense of fad diets and to save money on costly fast food and processed products. Encourage use of the graphic for meal planning such as having available as meal-planning cards as well as consistent use in various media.

**Methods to assist consumers in personalizing the new system:** Encourage the creation of healthy eating clubs and emphasize the connection between chronic illnesses and poor eating choices. Provide materials to diet and fitness centers to assist consumers in planning meals to lose weight. An emphasis in fitness should also be included.

**Interactive tools to demonstrate messages:** video games and other electronic media

**Communication delivery channels for the messages:** posters, TV, video, DVD, media technology

I appreciate your serious consideration of these comments as the process of revising the nation's food Guidance System continues.

Respectfully submitted,

Leona Joseph, M.A., CHES  
Program Supervisor, Nutrition Links

Penn State is committed to affirmative action, equal opportunity, and the diversity of its workforce.

MAKING LIFE BETTER

364

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

10/3 30 2004  
af

Schleifer 10/21

August 26, 2004

To Whom It May Concern:

I am writing to add my comments to the food guide pyramid.

Please emphasize healthier plant-based sources of protein such as beans, i.e. tofu and nuts in the "meat" group. Can you call it the "protein" group instead of the "meat" group? Or maybe you'd rather them change the "Milk" group to the "Calcium" group and feature leafy green vegetables, the healthiest source of the mineral.

Please also emphasize whole grains and flours. White flour and white rice have no nutrients. The Atkins craze is hurting the outlook of the American diet, but it is really just the white flour and white rice that needs to be reduced, or better yet, cut out of the diet. A high carb. diet is a more healthy diet, as long as it is a diet of whole grains and flours.

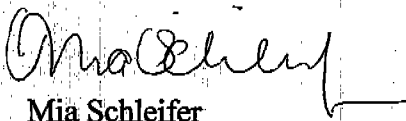
While it is clear that we need protein and iron which indeed can be found in meat products, we usually get too much from animal products. The public has been misinformed by the previous food pyramids.

I have attended the National Association of Vegetarians Summerfest this summer, heard many authorities speak and bought many books on the matter.

Please think about who you are getting input from and their ulterior motives. Think about what happened to the tobacco industry. It is amazing to me how the National Cattlemen's Beef Association pushes it's products and cause on The Food Guide Pyramid as well as other animal food industries.

Please do the right thing, and change the names of the food categories. Deemphasize the meat, dairy, and eggs and add importance to plant based food for all the necessary daily nutrition.

Kind regards,

  
Mia Schleifer

postmarked 8/27/04

365

**PATIENTS' NATIONAL  
CANCER  
INSTITUTE**

- By Recovered Patients
- Not Governmental
- Cost Free, Non-Profit

*Volunteer Support for Cancer Freshmen by Cancer Graduates at*  
[www.PatientsNCL.org](http://www.PatientsNCL.org)

August 27, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center For Nutritional Policy And Promotion  
3101 Park Center Drive Room #1034  
Alexandria, Va 22302

Palmer  
10F3

Aug 30 2004  
ref

Dear Team,

The diet illustrated by the enclosed food pyramid is so healthy and so powerful that it has helped to reverse cancer, cardiovascular disease, obesity, arthritis, etc.

We recognize that it may be politically difficult, but scientifically, a vegan diet, free of all animal products, may be ideal for America's health problems at this time.

I have heard that Japan, with an average intake of 300 mg of calcium daily, has far less osteoporosis than American dairy users. They use lots of dark greens. I hope you will feature dark greens as a source of calcium on the new pyramid.

There is growing recognition among the masses that sugar products and flour products should not be featured on a food pyramid - only whole grains.

But everyone agrees that vegetables and fruits are the healthiest foods, so logically they should be the base of the food pyramid.

Please find the strength to stand up to the giant food lobbies. You can do more for America's health than doctors and pharmaceutical companies.

Thank you,

*Ron Palmer*

Ron Palmer, Lead Volunteer  
Patients' National Cancer Institute  
[www.PatientsNCL.org](http://www.PatientsNCL.org)

postmarked  
8/27/04

**Patients' National Cancer Institute**  
San Diego, Ca

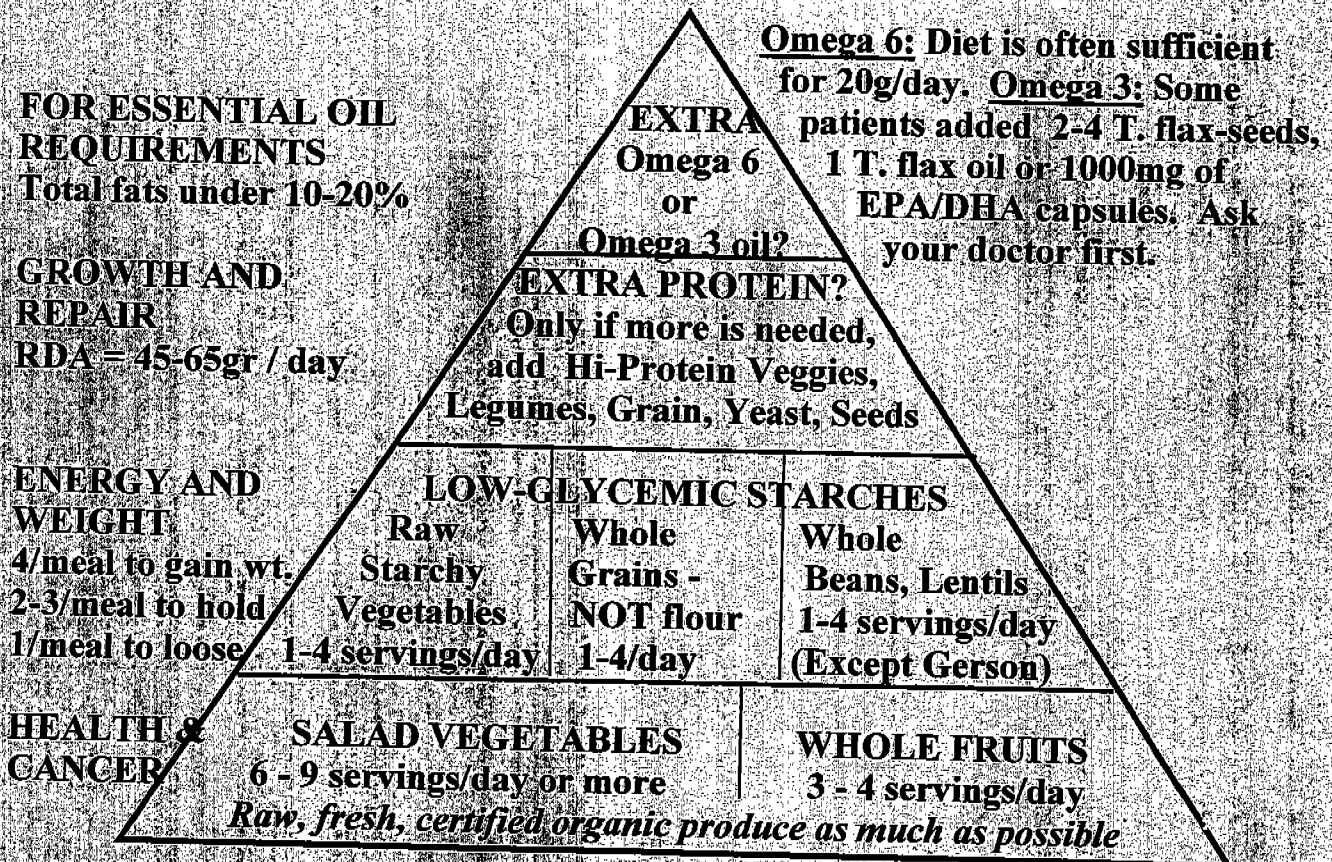


# VEGAN FOOD PYRAMID

Palmer  
2013

By PATIENTS' NATIONAL CANCER INSTITUTE [www.PatientsNCL.org](http://www.PatientsNCL.org)

For variety, successful cancer patients often combined several live-food diets to reverse their cancers. In this pyramid they combined the Dr. McDougall starch-centered vegan diet with the Gerson, Wigmore and Livingston anti-cancer diets. During therapy patients ate 80-100% food raw for maximum nutrients and enzymes. Fresh juices provided many raw vegetables. After the cancer was reversed, patients continued to eat at least 50-60% raw for optimum health.



**FREQUENT VEGETABLE JUICES**, freshly made and consumed, replaced most water during therapy. Cancer juice recipes emphasized carrots, dark greens (except hi-oxalic acid spinach) and cabbage family vegetables. Some natural flavors could be added and 1/4 tart apple for pectin. Delicious!

FOR THE COMPLETE ANTI-CANCER PROGRAM VISIT [www.PatientsNCL.org](http://www.PatientsNCL.org)

Copyrights, service marks and trademarks reserved by Patients' National Cancer Institute. Copies can be made for personal use of cancer patients without charge.

040402

# **VEGAN MEAL PLANNER - A 2000 Calorie Example from Patients' National Cancer Institute**

Visit [www.PATIENTSNCL.org](http://www.PATIENTSNCL.org) for a complete program to reverse cancer. Email [Webmaster@PatientsNCL.org](mailto:Webmaster@PatientsNCL.org)

A mostly raw, natural diet is so calorie-efficient, that 2000 calories may be too much. EXTRA protein, oils and starches can be reduced. But retain all fruit and salad-vegetable servings for health. Raw salad vegetables can provide the longevity benefits of calorie-restriction even when you eat all of them you want, so never go hungry.

Meal	Serving Sizes in grams of the principal nutrient				
	WHOLE FRUITS - 15gr sugars	STARCH-15gr carbs. Typically incl 1-3g protein	SALAD VEGGIES 5gr carb. Typically include 1gr protein	MAXIMUM OIL - 5gr oil. Typically include 2gr protein	Optional EXTRA PROTEIN-5gr per serving **
BB	1	2	1		
BRK		3	1	4	3
BL	1	1	1		
LUN		3	2	3	3
BD	1	2	1		
DIN		3	3	2	3
TOT	3 Servings	14 Servings	9 Servings	9 Servings	9 Servings**
	45 grams	210 grams	45 grams	45 grams	45 gr + 55 RDA
	180 calories	840 calories	180 calories	405 calories	400 cal. tot. prot.
% cal.	9%	42%	9%	20%	20% **

\*\*A balanced 2000 calorie vegan diet averages around the RDA for protein - about 55 grams. EXTRA protein is added in this example for athletes, or for cancer patients suffering from excessive weight loss, or internal damage from chemotherapy or radiation. But cancer doctors often recommend temporarily much lower amounts at first to freeze tumor growth.

## **START MEAL PLANNING WITH STARCHES: GRAINS, LEGUMES, AND RAW VEGETABLES.**

RAW FRUIT snacks, appetizers, desserts	LOW-GLYCEMIC STARCHES	RAW SALAD VEGETABLES	SEEDS/OILS	EXTRA PROTEIN above the RDA
Apple	<u>RAW VEGETABLES</u>	Asparagus	<u>OMEGA 3 OILS</u>	<u>ALL VEGETABLES</u>
Apricots - Med. Gly	Corn on cob	Beets & greens	Flaxseed	<u>CONTAIN PROTEIN.</u>
Banana-Hi glycemic	Parsnip salad	Broccoli	Walnuts	<u>THESE ARE ABOUT</u>
Berries	Potato salad	Brussels Sprouts	Purslane	<u>5GR PER SERVING:</u>
Blueberries	Root salad	Cabbage, all	Hemp	Beans
Cantaloupe -Hi gly.	Rutabaga salad	Carrots	Brazil nuts	Brussels sprouts
Cherries	Shitake mushrooms	Cauliflower	Soy	Corn on cob
Citrus	Squash, winter, grated	Celery	Lecithin	Grains
Cranberries	Turnip salad	Chards	EPA/DHA	Kale, cooked
Dates - Hy glycemic	Yam chips	Collards	Dark greens	Lentils
Figs - Hi glycemic	<u>GRAINS</u>	Cucumber	<u>OMEGA 6 OILS</u>	Split peas
Grapes	Buckwheat	Eggplant	Sunflower seeds	Shitake mushrooms
Kiwi	Bread, Essene, hemp, flourless, sourdough	Garlic	Pumpkin seeds	<u>OTHER PROTEINS</u>
Mango-Med. glycemic	Barley, sprouted	Kale	Sesame seeds	Bread, flourless
Nectarine	Bran, wheat, rice, oat	Leeks	Almonds	Buckwheat
Papaya - Hi glycemic	Kamut, sprouted	Lettuce, dark	Nuts	Grains
Peaches	Oats, steel-cut	Onions	Borage oil	Legumes
Pears	Pasta	Parsley	GLA	Nuts
Persimmon	Rye, sprouted	Peppers	<u>OMEGA 9 OILS</u>	Pea powder
Pineapple	Rice, not short or inst.	Radishes	Avocado	Rice powder
Plums	Sprouts, mixed	Seaweed, not Kombu	Olives	Seeds
Raisins-Hi glycemic	<u>LEGUMES</u>	Spinach	Raw peanuts	Soy products
Strawberries	Beans and Lentils	Squash, summer		Wheat germ
Watermelon-Hi gly.	Split peas	Tomato		Yeast powders
		Turnip greens		

Jennifer Beard Rubenstein

Louisville, KY

(366)

August 27, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Aug 30 2004  
af  
(Rubenstein)

for 1

To Whom It May Concern:

I'm writing this letter regarding the upcoming changes to be made to the Food Guide Pyramid. I encourage the USDA to emphasize healthier plant-based sources of protein such as beans and nuts in your "meat" group. Plant-based foods can also contain complete proteins, and are a healthier alternative to the saturated-fat laden meat. I also think it would be beneficial to change the "Milk" group to the "Calcium" group and feature leafy green vegetables, which are the healthiest source of this mineral. The American Dietetic Association has published a position paper on vegetarian diets, stating that they are just as healthy if not healthier than the standard American diet. Please consider emphasizing these healthy alternatives. Thank you.

Sincerely,

Jennifer Rubenstein

Jennifer Beard Rubenstein

postmarked 8/27/04

Date: August 27, 2004

367

Jeanne  
1002

AUG 30 2004  
Jef

To: Food Guide Pyramid Reassessment Team USDA Center for Nutrition Policy & Promotion  
3101 Park Center Drive, Room 1034 Alexandria, VA 22302

From: Anita Jeanne

Atlanta, GA

Email:

The present food pyramid along with high powered advertising are part of the reason we are the fattest and most unhealthy we have ever been in this country. Immigrants from other countries who adopt our way of eating become overweight and get many diseases not common in their countries. The change is long overdue. People are getting diseases in their youth that they used to get as they aged. The American public should know the truth. We do not need just a few tweaks to the present pyramid. We do not need small changes that allow manufacturers to spin new products and consumers to gradually change their diets. The public needs guidance for changes NOW! The U.S.D.A. needs to get it right this time, our lives are depending on honest information. Individuals can make their own choices- just give us the truth. Enough studies are out there that prove the following proposed guidelines. The TRUTH is needed- some will follow and some will not. We cannot change everyone. Some will eat what they want with no consideration of their health. People that want to improve are confused and need guidance, they need the truth. There are many diet books out there that do not work long term, this is why there are so many- because they do not work. With all of our intelligence and knowledge it is embarrassing to be the most overfed, overweight, malnourished country in the world. We have to stop letting the food industry and diet books, whose interest is dollars, affect the health of our nation. This change in the food pyramid should not be influenced by any special interest food groups. It should be based on how we should eat to get the most nutrition out of our food choices. Our most nutritious foods are whole fruits, vegetables, nuts and seeds that do not come in packages. These contain a large amount of antioxidants, phytonutrients, omega 3 fatty acids, vitamins and minerals. These nutrients and antioxidants are protection for plants and will also protect us from chronic disease. The nutrients we need to get from our food cannot successfully be obtained from a pill. The nutrients we get from food work synergistically with each other. To get enough of these nutrients we need to be eating a lot of fruits and vegetables.

The Following Pyramid Is Proposed: 1. The base should be the maintenance of energy, having an exercise program and controlling calories and weight. 2. The next level should be a variety of organic healthy whole carbohydrates such as fruit and vegetables having color: green, yellow, orange, red, blue, purple, with a large portion of this uncooked to preserve the nutrients. 3. The next level should be whole grains and starchy vegetables. 4. The next level should be legumes, beans, peas, sprouted nuts and seeds. 5. The next level should be limited amounts of fats from fruits, vegetable, nut and seed sources. With no more than 20-30% of our calories coming from these healthy fats. 6. A strong notation should be made on the pyramid of foods that should be eaten rarely and eventually eliminated completely from the diet. These should be: salt (no more than 1000 mg/day or less), sugar, high fructose corn syrup, and other processed sugars, refined grains, trans-fatty acids, and saturated fat (all animal products have saturated fat). All of these foods need to be eliminated completely from the diet, not cut in half as proposed by the USDA.

postmarked 8/27/04

Jeanne 2 of 2

7. What professional in the health and nutrition field is telling us that we are deficient in saturated fat, sugar, refined grains, or trans-fats and need to get them into our diet? These foods cause inflammation and can lead to many of the chronic diseases that plague our society. If these unhealthy foods are eaten then there would not be enough calories left for the fruits and vegetables containing a large amount of antioxidants, phytonutrients, vitamins and minerals which can keep the body healthy. 8. If enough of the levels two through five are eaten to maintain energy and a healthy weight there will be more than adequate protein, folate, calcium, omega 3 fatty acids, and other nutrients in the diet. (refer to the World Health Organization's recommendations for protein needs). Animal protein and fat are not necessary for a healthy diet. 9. A plant based vegan diet with a healthy variety of uncooked fruit, vegetable, nuts, and seeds is the healthiest way to eat.

Sincerely,

Anita L. Jeanne

Anita L. Jeanne



August 27, 2004

368

Norell

LOFI

AB 30 2004  
af

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Dear Team Members:

I am very supportive of your important efforts to update the Food Pyramid to reflect current research and nutritional consensus. I think you are aware that many thousands, even millions, of people have been eating a vegetarian or vegan diet in the last several decades. Many of us have enjoyed as good health - or better - than our meat-eating friends and family members.

I believe the new nutritional guidelines should cover energy sources like carbohydrates, fat sources (especially the "good" fats from flax, etc.), protein sources, and sources of essential vitamins and minerals that may be rarer in other food groups. I believe that this categorization would satisfy both those who choose to continue consuming animal products, and those who avoid doing so (whether for ethical, religious, or allergy reasons).

Please ensure that you are not unduly influenced by special interests. Although the economy is important, your task is to outline the most sensible diet for the majority of U.S. citizens. It would be unconscionable to allow the lobbying of the animal-based agriculture industries to weigh more heavily in the process of creating the guidelines than scientific observations.

Thank you for your efforts in this matter, and your serious consideration of my opinion.

Sincerely,

Aire Celeste Norell

Los Angeles, CA

postmarked  
8/27/04

postmarked 5/1/77

ask

369

Waters  
1 of 1

Dear USDA Reassessment Team  
You have a very important job in influencing the  
public health of this great nation.  
Please consider emphasizing proteins  
from beans and nuts in your "meat"  
group.

Also, please consider the calcium  
from leafy <sup>green</sup> vegetables in your "milk"  
group.

The increase of servings <sup>of fruits & vegetables</sup> per day to 5-9  
is also crucial to reducing obesity  
and diabetes in our nation's populace.

Sincere thanks,  
(MPH candidate, JHU) Marilyn Waters

370

James Kundart, O.D., M.Ed., F.A.A.O.

Easton, Pennsylvania

Phone \_\_\_\_\_, Fax \_\_\_\_\_

E-mail: \_\_\_\_\_

Kundart/1041

AUG 30 2004  
ast

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

August 26, 2004

Dear Food Guide Pyramid Reassessment Team:

It has come to my attention that changes are being considered to the current Food Guide Pyramid. I would like to express my support for the Pyramid the way it is.

Coming from a generation that grew up with the four food groups, I felt the Food Pyramid clarified nutritional goals for me. With the old four food groups, it was always implied that one should consume in equal quantities, ideally at each meal. The Food Pyramid, on the other hand, recommends consumption in the proper proportions.

As an eye doctor, I have seen the effects of excessive cholesterol, fat and sugar on the tissues of the eye and the vision of my patients. I often refer them to the Food Pyramid to help guide their eating habits and protect their vision.

I understand that your team may be under considerable pressures from various industries to increase the share of "real estate" their products have in the official USDA recommendations. If this is the case, I would urge you to resist such pressures and follow the recommendations of science and health care professionals, like myself.

Sincerely yours,

*James Kundart OD*

James Kundart, O.D., M.Ed., F.A.A.O.  
Doctor of Optometry

postmarked 8/27/04



M. Sharon Gambocorto

Baldwinsville, NY

(371)

August 26<sup>th</sup>, 2004

Gambocorto  
1021

AUG 30 2004  
af

To USDA Food Pyramid Committee:

Since you are updating the food pyramid, I would like to share my thoughts with you. I would suggest that you put high on the pyramid a diet rich in plant-based proteins such as beans, nuts and whole grains. These foods also provide fiber and good fats. Also, foods rich in calcium, such as leafy green vegetables, are also high in vitamins and minerals. You might consider a CALCIUM group rather than limiting it to a milk group.

Thank you for considering my suggestions.

M. Sharon Gambocorto  
Sharon Gambocorto

postmarked 8/27/04

372

AUG 30 2004  
asf

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

Mari 1 of 1

Please be advised.

We Know.. and we hope you do!

We are Vegucating the public.. Maybe you could do the same? Its time for a smarter America. This ignorance about health and care for the human body is coming to an end

WE KNOW that we are aware that Organic, Whole, Ripe, Raw, Fruits, Vegetables. Sprouted Nuts, Seeds are the best food sources for pure vibrant health and healing of all dis-eases. Please make it apparent in the new food pyramid.

Please let the food choices reflect the optimal VEGETARIAN choices that are better for human health and the planet. Health of the Planet and People are linked.... And Vegetarian (whole, fresh, ripe, raw, organic) food choices are the absolute best for ALL!

Undo the ignorance of Americans and allow true choice to happen.

Calcium Group=Green Leafy Vegetables, Sesame Seeds  
Protein=Nuts, Beans, Seeds, Whole Fruits & Vegetables  
Fats=Avocados, Seeds, Nuts, Olives, Fresh pressed oils  
Sweets=Fruit

Be real.. Tell the truth.. Unprocessed whole foods, Oils that have not been heat treated.. We know.. the truth.. We do! Help spread truth.. so the planet and everyone can truly benefit. Let's get real. Stop supporting the death industry (dead animals)..and start supporting life!

Come on.. we know the truth. We are living proof! Vegan (no animal products) and predominately Raw, Organic, Fruit, Vegetables, Nuts & Seeds are the best foods for adult and children. Infants should be fed their mothers milk.. not milk of a cow or other animal. Come on!! We know the truth!! Do you??

Please be a bit more creative.. and impress the world with leading health information.

Thank You,  
Denise Mari

NYC  
Denise Mari

postmarked 8/27/04

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

373

ack

Narantia

Please be advised.

We know.. and we hope you do!

We are Vegucating the public.. Maybe you could do the same? Its time for a smarter America. This ignorance about health and care for the human body is coming to an end

WE KNOW that we are aware that Organic, Whole, Ripe, Raw, Fruits, Vegetables, Sprouted Nuts, Seeds are the best food sources for pure vibrant health and healing of all dis-eases. Please make it apparent in the new food pyramid.

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Calcium Group=Green Leafy Vegetables, Sesame Seeds  
Protein=Nuts, Beans, Seeds, Whole Fruits & Vegetables  
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Be real.. Tell the truth.. Unprocessed whole foods, Oils that have not been heat treated.. We know.. the truth.. We do! Help spread truth.. so the planet and everyone can truly benefit. Let's get real. Stop supporting the death industry (dead animals)..and start supporting life!

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Please be a bit more creative.. and impress the world with leading health information.

Thank You,

Kara Narantia

postmarked 8/27/04

374

at

08/26/04

(Greenslate) 1 of 1

DEAR FOOD PYRAMID REASSESSMENT TEAM,

I'M WRITING TO MAKE A COUPLE OF SUGGESTIONS FOR THE FOOD PYRAMID. I'm Hoping that with the current OBESITY EPIDEMIC IN OUR COUNTRY, you will CONSIDER ADDING FOODS SUCH AS BEANS AND NUTS to your "MEAT" group. OTHER protein-rich Foods SUCH AS SOY-MEATS AND TOFU would be beneficial additions AS WELL. I WOULD ALSO LIKE TO SEE THE CURRENT "MILK" group changed to a MORE ACCURATELY NAMED "CALCIUM" group. Within this group you could feature leafy green vegetables (possibly the healthiest source of THE Mineral) as well as other foods like SOYMILK, ETC. OVERALL I WOULD LIKE TO SEE A MUCH STRONGER EMPHASIS ON HEALTHY PLANT-BASED SOURCES OF PROTEIN AND CALCIUM. THANK YOU FOR YOUR TIME, AND I HOPE YOU CONSIDER MY VOICE IN YOUR REASSESSMENT OF THE CURRENT FOOD PYRAMID.

postmarked 1 of 1

SINCERELY,

CHRISTOPHER GREENSLATE

Chris Greenslate

ENCINITA  
CA

BELLPORT, NEW YORK

August 26, 2004

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

375

AUG 30 2004  
ast

Greene / or /

To the members of the Reassessment Team:

Twelve years ago, the Food Guide Pyramid represented a bold step in the right direction of healthier eating. I'm glad you are working now to update it, and I would like to contribute the following comments.

I'm a Long Island housewife. I do most of the cooking and food shopping for our family. When it comes to nutrition, I've done my homework—and I know that even with the help of the Food Guide Pyramid these past years, our society still faces serious problems in terms of diet. We should be eating more *whole* foods, more vegetables and fruits and legumes. Instead, as a nation we still tend to eat too much saturated fat, too little fiber, too many empty calories.

"Choose most of what you eat from plant sources," say the country's top mainstream medical & health organizations: the National Institutes of Health, the American Heart Association, the American Cancer Society, the American Academy of Pediatrics, and the American Dietetic Association (in their consensus statement of 1999). That's *not*, however, the advice our nation's meat & dairy producers want consumers to hear.

I understand that part of the USDA's mission is to support these producers. But our population is suffering a health crisis of epidemic proportions. I urge you to do what's right in terms of public health, not politics.

Your team needs to make sure the updated guide sends this message: *the way to eat better is to move towards a more whole-food, plant-based diet*. This is true for all of us—not just the vegetarians and vegans. Eating more plant-based meals makes good sense for everyone.

Since a prime example of how to "eat less saturated fat" is to eat less meat & dairy, you may need to rethink the prominence of meat & dairy in the group names and serving recommendations. *High-fat meat and animal products ought to be eaten sparingly*, say the NIH, AHA, ACS, AAP, & ADA. Shouldn't the next food guide reflect this advice?

And consider creating a "Calcium" group, instead of a "Milk, Yogurt & Cheese" group. Be clear that calcium *balance* is important, not just intake. In our home, we get calcium from fortified soy milk, rice milk, and orange juice; kale and collard greens; and tofu. The need to avoid saturated fat, cholesterol, or lactose means that dairy products are often *not* the best choice. Shouldn't the next food guide help debunk the notion that dairy is the only, or best, source of calcium?

I hope these comments are helpful to your team.

Sincerely,

Jennifer Greene

Jennifer Greene

Postmarked  
8/27/04

Club Veg: Vegetarian Education Group

Bellport, NY

8/26/04

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

376

Hamlin/10-2

To whom it may concern,

I am writing to offer the following comments on the USDA Food Guide Pyramid.

1. Emphasize healthier plant-based sources of protein such as beans and nuts in the "meat, poultry, fish, dried beans and eggs" group.
2. Change the name of the "meat, poultry, fish, dried beans and eggs" group to the "concentrated protein" group – since protein is in everything, we want to distinguish that these are concentrated proteins. Since animal products are associated with disease the food group name should not include the names of categories of animal products.
3. Change the name of the "Milk" group to the "Calcium" group and feature leafy green vegetables, the healthiest source of the mineral, and other healthy sources from other food groups. This is important since the majority of the worlds population is lactose intolerant. To imply that all people should include dairy in their diets is wrong given the amount of lactose intolerance, a natural condition, and considering the amount of dairy allergies.
4. Somehow indicate that trans fats are bad and indicate what foods have them ie: 90% from processed foods including anything that includes hydrogenated oils, partially hydrogenated oils, or shortening, and includes most deep fried foods, especially those from restaurants, and 10% from animal products.
5. Include a section on essential fatty acids and include the best sources that do not have downsides (such as fish which might also have contamination and is not sustainable.)

In general, it would be nice to see a food guide that is not based on industry pressure, but rather what we actually know through science is the healthiest way to eat for disease prevention. Here is a food guide that was created by my organization. Please feel free to utilize this concept.

Thank-you

Amie Hamlin

Director, Club Veg: Vegetarian Education Group

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9/23/04

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# Common Sense Eating Guide

CALCIUM  
RICH

Eight  
glasses of  
water

VEGETABLES  
Vegetable Juices  
canned vegetables

HEALTHY HIGH  
CARBOHYDRATES  
Whole Grain  
breads & pastas

HEALTHY  
FATS

HEALTHY HIGH-PROTEIN FOODS  
Milk, meat, soy,  
hardened vegetable protein

fortified  
orange  
juice

FRUITS  
canned fruits  
fruit juices

## CAUTION

These foods can fit into a healthy diet, but quantities should be limited.

\*These are only a few examples of calcium-rich plant foods.  
\*\*Fish are a source of omega-3's, but they are not recommended due to mercury, other contaminants, & a lack of sustainability. Instead use flax seeds, the richest source, and walnuts.

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[Warner] 1 of 1

The Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive Room #1034  
Alexandria, VA 22302

August 26<sup>th</sup> 2004

It is a tragedy that so many people continue to ignore the fact that the leading cause of heart disease, cancer and obesity is the consumption of animal products. Sadly, with their false advertising and lies, the mighty beef, poultry and dairy industries continue to blind people to the enormous dangers to our health created by a meat and dairy based diet.

As publishers of The Food Guide Pyramid you are in the unique position of being able to change public perceptions of what is healthy and what is not. Please do not waste this precious opportunity by bowing to pressure from the likes of The National Cattlemen's Beef Association, the Poultry Times, the American Meat Institute and the Atkins Corporation. These organizations are not remotely interested in public health, but rather in their own profits. The need to promote a plant-based, meat and animal product FREE diet for the health of our nation has never been more urgent. Please ensure that your Food Pyramid reflects the need to move away from meat and other animal products towards a diet consisting of fruit, vegetables, nuts, wholegrains and plant-based protein.

Mike and Joanna Warner  
Richmond, California

Joanna Warner  
Joanna Warner

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8/26/04



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## From Fast Foods to Fad Diets... to Eating for Health

by Edward Bauman, M.Ed., Ph.D.  
www.baumancollege.org

*"Americans now spend more money on fast food than on higher education, personal computers, computer software or new cars."*

Bauman

1 of 5

The health of most Americans is worsening as you read this. Why so? We all have too much stress, not enough time to exercise, eat right, and relax. Okay, I have stated the obvious. Our childhood desire for foods that are soft, sweet and creamy or salty, crunchy and greasy has for many, become the preferred standards of cuisine. I call this epidemic "fork and mouth" disease, sold to us in our youth by television and marketing and programmed in our brain as a reliable pleasure provider. The result is an unprecedented rise in obesity, blood sugar imbalances, illness and irrationality.

The processed and synthetic foods many Americans eat daily have led to the decline of their health, vitality and body composition. Fast foods, as documented thoroughly in the books, *Fast Food Nation*, by Eric Schlosser, and *Crazy Makers* by Carol Simontacchi, are made from the least expensive materials, loaded with chemicals, damaged fats, artificial ingredients and flavor enhancers that children and adults find delicious and nearly impossible to resist. Fast foods are stimulating without being nourishing...but they are profitable. Junk food marketers target children as young as three years old, and in 2002 spent an estimated \$15 billion in marketing solely on children.

Current research articles have indicated that fructose intake is strongly correlated not only with obesity but cardiovascular disease due to its elevating effect on blood fats, particularly triglycerides. High fructose corn syrup replaced refined sugar in 1970 as the sweetener of choice for its low cost and claims of being a healthy, non-insulin stimulating sugar. Fructose in an apple is a far different substance than the white powder poured into soft drinks, pastry products, and thousands of packaged foods and beverages. The apple is rich in vitamins, minerals and fiber, whereas fructose powder is totally devoid of the nutrients needed for proper blood sugar regulation. According to Jeffrey Bland, Ph.D., fructose is processed in the liver as a chemical that increases oxidation, inflammation and allergic response, which makes it stimulating and debilitating at the same time.

A combination of artificial or refined sugars with poor quality or cooked fats, is a recipe for weight gain and brain chemistry alterations such as depression, insomnia and panic attacks. People suffering from fatigue, weight gain, and mood disorders are likely candidates for fad diets, medication, extreme exercise and other unhealthy behaviors. Recreational drug and alcohol abuse is often used as a coping device for looking and feeling poorly.

The Atkins diet has preyed on this type of unhealthy person, the overweight, moody and exhausted by providing them with an alternative-eating plan that, for many, only works for a short time. This plan is based on eating largely protein and fatty foods with little or no carbohydrates for the first two weeks. The carbohydrate exclusion forces the body to burn fat by a process called ketosis, which allays hunger and expedites weight and fat loss. After this "induction" period, dieters are allowed only minimal carbohydrates. So, what is the problem? The good news is high protein diets all but eliminate refined and artificial sugars.

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The bad news is high-protein diets can be extremely lacking in natural, unprocessed plant foods that serve a variety of necessary functions in the body. To compensate, numerous dietary supplements are provided to make up for the deficits in the diet. This is woefully inadequate, as these supplements may be synthetic and poorly absorbed, with only a limited and temporary benefit.

Little attention is directed to the quality of protein and high-fat foods on the Atkins diet. One can easily be a Taco Bell, McDonald's and Baskin Robbins Atkins eater. Mass-marketed animal foods tend to be loaded with bovine growth hormones, antibiotics and pesticides that concentrate in the animal's fat tissue writes John Robbins in his book, *The Food Revolution*. These substances are not safe for daily consumption, which is the case with a typical non-organic, Atkins dieter. Yes, they may lose weight and receive a big boost of energy, but they are also stressing their liver, kidney and immune system with antigens and carcinogens that, with repeated ingestion, may expedite cancer, or autoimmune disease. This is too great a life long risk for the short-term benefits conferred.

*"Going from fast food to Atkins to Eating for Health is a journey of the soul... from the depths of unknowing to the heights of maturity, choice and regeneration"*

Edward Bauman, Ph.D.

The Atkins diet and other, similar programs are not long term solutions to chronically overeating refined flour products such as breads, pasta and pastries. Eventually, weight loss will plateau and the high-protein dieter becomes sluggish, moody and as tired as before... only to 'fall off the wagon' and return to refined carbohydrates. The joy of eating donuts, a bag of cookies or a heaping bowl of spaghetti is so great that many people cannot contain themselves and revert back to their over-consuming ways, with a gusto that says, "Who cares how I look, I love refined carbohydrates!" This attitude is an addiction to sugar and processed foods that is cyclical and difficult to overcome. Professional nutritional counseling is often needed to help carbohydrate addicts restore and balance their metabolism.

The major flaw of the Atkins diet is that many people, in their zeal to shed pounds, erroneously eliminate too many carbohydrates, thereby becoming deficient in much needed fluid, fiber, antioxidants, and trace elements found in complex carbohydrates.

Another detriment of the high protein, low carbohydrate diet is its potential adverse effect on the acid/alkaline balance. Protein foods, such as meats, fish, eggs, poultry and dairy products are high in nitrogen and therefore, acid forming. Over-consuming acid forming foods creates acidosis (hyperacidity). The blood, lymph, mouth and small intestine need to maintain an alkaline predominance to carry out metabolic functions. Fruits, vegetables, herbs and non-glutinous grains, such as millet, quinoa and brown rice are alkaline forming.

Susan Lark, MD author of *The Chemistry of Success: Secrets of Peak Performance* states that acid forming diets contribute to a negative mineral balance that leads to degenerative conditions such as osteoporosis, arthritis, fibromyalgia, gout, liver and kidney disease. Continued high protein intake, will eventually strain the digestive system, create putrefaction in the gut and over stimulate the immune system which will perceive excessive protein as antigenic (toxic, bacterial etc.) material.

Relying on these unbalanced diet approaches to achieve weight loss typically leads to another diet failure and another diet book gathering dust on the shelf. People are designed to live and eat in balance.

Natural foods are the basis for the Eating for Health approach. I created the Eating for Health model (See Figure 1) to provide a bull's eye method for choosing a wide variety of whole, natural foods to satisfy numerous vital health needs. The overwhelming benefit is that a person can choose between many different healthy foods. Rather than reducing the amount and variety of foods consumed, Eating for Health encourages people to eat a plant-based diet, with no more than 50 percent of protein from animal sources, for ecological benefits to the soil and one's digestive system. Careful attention to food quality, quantity and variety, as well as seasonal factors are the foundation of this approach.

Within an Eating for Health food plan, a person can build nutrient-dense meals with one or two servings of a complete protein and quality fatty acid, complemented with an equal or greater amount of fresh fruits and vegetables, and accented with food condiments called booster foods, such as nutritional yeast, sea vegetables, algae and culinary herbs and spices. Attention to colorful foods, such as red, orange, green, and yellow fruits and vegetables are encouraged to provide ample antioxidants and alkaline minerals, such as calcium, magnesium, potassium, chromium, selenium, and zinc. This gives a person variety and abundance without being as filling as either a predominantly meat or refined grain diet.

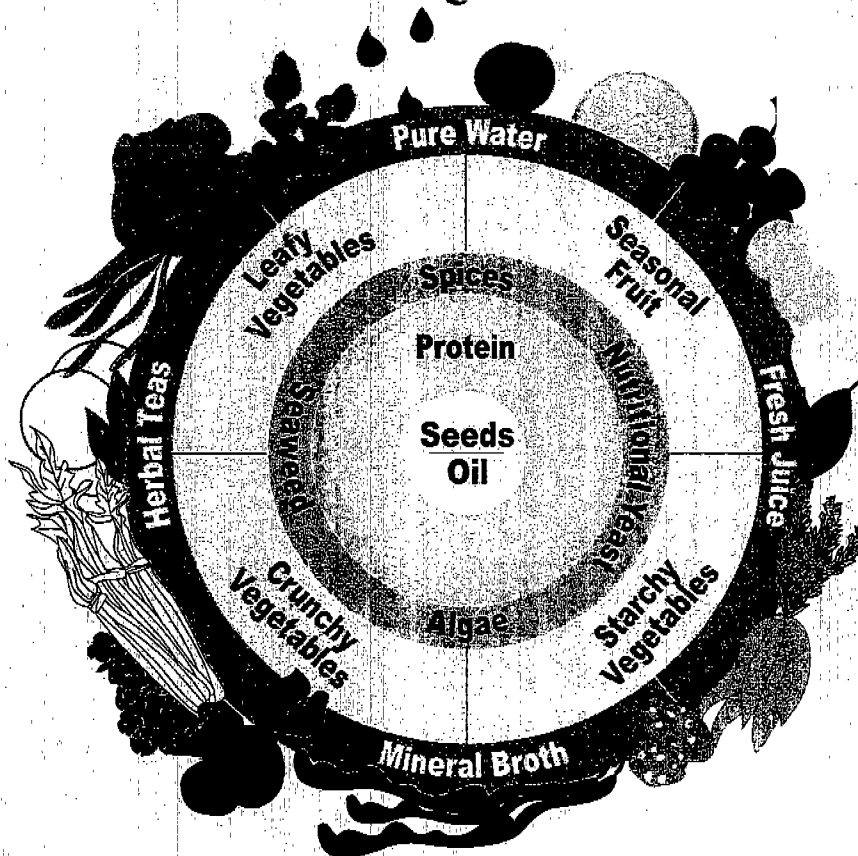
Going from fast food to Atkins to Eating for Health is a journey of the soul... from the depths of unknowing to the heights of maturity, choice and regeneration. Yes, it does take time, and in most cases, a teacher, class and family support are most helpful. It is a tragedy that people have to become sick before they wake up and take responsibility for what they put into their precious bodies.

Hopefully, we are at the end of an era in which mass marketing, media and government subsidy supports a climate of consumption that makes us, vulnerable and without will or even hope... simply to put money in the pockets of the giants of agriculture, food production and medicine. Eating fast food or being on an unbalanced diet will not provide the nutritional support for our population to think clearly and change the way we are living politically, economically and ecologically. Eating for Health holds great promise to reverse illnesses that plague so many of our citizens. In time, as it becomes more widespread, and people awaken to what nature can provide, a new era of health, prosperity and spirituality will emerge, albeit out of the wreckage of fast food packaging and the diet books decomposing in our landfills.

To eat whole, natural foods is a sign of recovery from an era of misinformation and gullibility. Spread the knowledge of what the body needs to grow and repair itself and do not be fooled by false claims of better living through chemistry. Nature is what sustains the planet and all its beings. Growing, buying and consuming fresh, natural food will bring optimal health to the body and healing to the earth.

Figure 1

# Eating for Health



**A Rejuvenating Food System**  
© by Edward Bauman, Ph.D.



*Organic, Seasonal, Nutrient-rich, and Individualized*

	Saeds/Oils	Protein	Leafy Vegetables	Crunchy Vegetables	Starchy Vegetables	Seasonal Fruit	Booster Foods
Daily servings	2-3	2-4	1-3	1-3	2-4	2-4	2-4
Servings size	1 Tbs. oil 2 Tbs. saeds	3 oz. animal 6 oz. legume	1 cup	1/2 cup	1/2 c. root vegetable grains, bread	1/2 cup or 1 medium piece	1 teaspoon to 1 tablespoon
Examples	Flax, sunflower, sesame, almonds	Poultry, fish, eggs, milk, beans	Salad mix, kale, spinach	Broccoli, string beans, cukes, onion, celery	Yams, winter squash, corn, millet, rice	Berries, apple, grape, citrus	Nut, yeast, algae, seaweed, spices



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Dear experts,

Pevchin /af/

I would like to bring to your attention several problems with existing food guide pyramid. I hope that You will take into account how much people in US value Your opinion. At the same time it does not reflect all the diversity of life styles, cultures, diets in our countries. Many controversies are related to dairy products, which are proven to be less than perfect source of calcium and other nutrients. Current state of the milk producing industry and lack of control over the quality of its product put many people in danger.

Thank You,

Sergei Pevchin

August 27, 2004.

postmarked 8/27/04

8/26/04

Dear Team;

(380)

Sullivan

10/1

AUG 31 2004  
asf

I have been a vegetarian for many years and am a very healthy person. I work as a staff member at a hospital offering a well known diet and exercise program to benefit cardiac patients. We have documented many healthful changes in lipid levels, weight, reduction of meds, improvement in blood sugars, increased energy and some actual reversal of artery blockage.

The nutritional part of the program is a vegetarian diet, with no animal proteins or saturated fat allowed.

When you plan the new food pyramid, please consider omitting milk, and instead suggesting calcium esp. in the form of leafy green vegetables.

Also, suggesting plant based sources of protein is a much healthier alternative to beef.

I hope the meat and milk lobbying industry does not influence your decision, and an objective desire to help people be healthier prevails.

Sincerely,

Judith Sullivan, CYT

Judith Sullivan, CYT

Johnstown, PA

postmarked 8/27/04